Exhibit List

1 Letter from Dynegy Midwest Generation, LLC to Edwin C. Bakowski at the Illinois Environmental Protection Agency, Vermilion Power Station: Notice of Permanent Retirement (November 30, 2011).

2 Map of the DMG power stations superimposed on a map of the Illinois air monitoring stations.

3 Table containing information about the power stations (number of employees, emissions, controls, etc.)

4 Illinois Environmental Protection Agency, *40th Annual Air Quality Report Illinois 2010* (December 2011), pp. 34-42 (information regarding air monitoring stations in Illinois).

5 Letter from Dynegy Midwest Generation, Inc. to Raymond Pilapil at the Illinois Environmental Protection Agency, Notice of Intent to Participate in MPS (November 26, 2007).

6 Letter from Dynegy Inc. to Congressman Bobby Rush, EPA's Cross-State Air Pollution Rule (September 12, 2011).

7 U.S. Environmental Protection Agency, *Assessment of Impact of Consent Decree Annual Tonnage Limits on CSAPR Allocations*, TSD, Docket ID No. EPA-HQ-OAR-2011-0491 (October 4, 2011).

8 Table containing supporting calculations regarding reductions from outages.

9 Table containing estimated 2012-2014 emissions based upon the MPS emission rates applied to 2007-2010 average heat input.

10 Letters from MISO, Inc. to Daniel P. Thompson at Dynegy Midwest Generation, LLC (October 20, 2011, and January 12, 2012) (approving retirement of certain units).

11 Illinois Environmental Protection Agency, *Technical Support Document for Best Available Retrofit Technology Under the Regional Haze Rule*, AQPSTR 09-06 (April 29, 2011), pp. 22-27, Appendix C.

12 Letter from Laurel Kroack, Illinois Environmental Protection Agency, to Cheryl Newton, U.S. Environmental Protection Agency, Region 5 (June 2, 2011) (SO_2 NAAQS designation recommendations).

EXHIBIT 1

Letter from Dynegy Midwest Generation, LLC to Edwin Bakowski, Illinois EPA

Notice of Permanent Retirement of the Vermilion Power Station

(November 30, 2011)

Dynegy Midwest Generation, LLC
604 Pierce Boulevard
O'Fallon, IL 62269

DYNEGY

November 30, 2011

Mr. Edwin C. Bakowski, PE
Permit Section Manager
Division of Air Pollution Control, Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62794

**Re: Vermilion Power Station, Facility ID No. 183814AAA
Notice of Permanent Retirement**

Dear Mr. Bakowski:

Dynegy Midwest Generation, LLC (DMG) hereby notifies the Illinois Environmental Protection Agency, Bureau of Air that it has permanently retired Vermilion Power Station (Facility ID No. 183814AAA), effective November 17, 2011. This permanent retirement affects all emission units at the facility.

DMG therefore requests withdrawal and termination of all air permits and associated pending applications for Vermilion Power Station. A listing of the permits and pending applications to be withdrawn and terminated is attached.

DMG has concluded that it is not obligated to pay CAAPP permit fees for Vermilion Power Station for periods after November 17, 2011, since the facility's allowable air emissions become zero as of that date. (Section 39.5(18)(a)(i)(A) of the Environmental Protection Act). The facility's actual emissions have been near zero since March 24, 2011, when the last generating unit was mothballed.

DMG also notifies IEPA that it will not submit periodic reports documenting the Vermilion facility's compliance with the Illinois Mercury Rule (35 IAC Part 225, Subpart B) for periods after November 17, 2011. In addition, the two generating units at Vermilion will no longer be included in DMG's Multi-Pollutant Standards (MPS) Group as of November 17, 2011.

If you have questions regarding this submittal, please contact Rick Diericx at 618-206-5912.

Sincerely,
Dynegy Midwest Generation, LLC

Daniel P. Thompson
Vice President and General Manager

Attachment

Attachment

Listing of Air Permits and Associated Pending Applications for Vermilion Power Station (Facility ID No. 183814AAA) for Withdrawal and Termination Due To Permanent Facility Retirement

Permits

Permit/Application Number	Permit Type	Subject	Date Issued
95090050	Title V/CAAPP	Power Plant/Electrical Power Generation *(Note: this permit was stayed by Board Order of the Illinois Pollution Control Board dated February 16, 2006, Case No. PCB 06-73)*	9/29/2005
06030002	Construction	Baghouse and Sorbent Injection System for Units 1 and 2 *(Note: portions of this permit were stayed by Board Order of the Illinois Pollution Control Board dated October 19, 2006, Case No. PCB 06-194)*	5/30/2006
05030030	Construction	Vermilion Units 1 and 2 Low Sulfur Coal Conversion/Pollution Control Project	4/06/2005
02050021	Construction	Dry Fly Ash Handling System	8/07/2002
02030012	Construction	Installation of New Flue Gas Conditioning Systems for Units 1 and 2	4/22/2002
01070013	Construction	NOx Emission Reduction Project	2/21/2003
73020949	Operating	Coal Handling and Storage	6/21/1994
73020325	Operating	Vermilion Gas Turbine	3/29/1993
73020948	Operating	Standby Steam Generation	2/09/1998
73020841	Operating	Vermilion Fuel Tanks	9/28/1994
73020064	Operating	Vermilion Unit 1	11/25/1997
73020063	Operating	Vermilion Unit 2	11/25/1997

Pending Applications

Subject	Date Submitted
CAAPP Renewal Application	12/28/2009
CAAPP Amendment Application (incorporate new baghouse and sorbent injection system)	6/27/2008
CAAPP Amendment Application (incorporate requirements of Consent Decree)	11/21/2005

EXHIBIT 2

Map of DMG Power Stations Superimposed on a Map of the Illinois Air Monitoring Stations

1 – Hennepin
2 – Havana
3 – Vermilion
4 – Wood River
5 – Baldwin

Statewide Map of Air Monitoring Locations

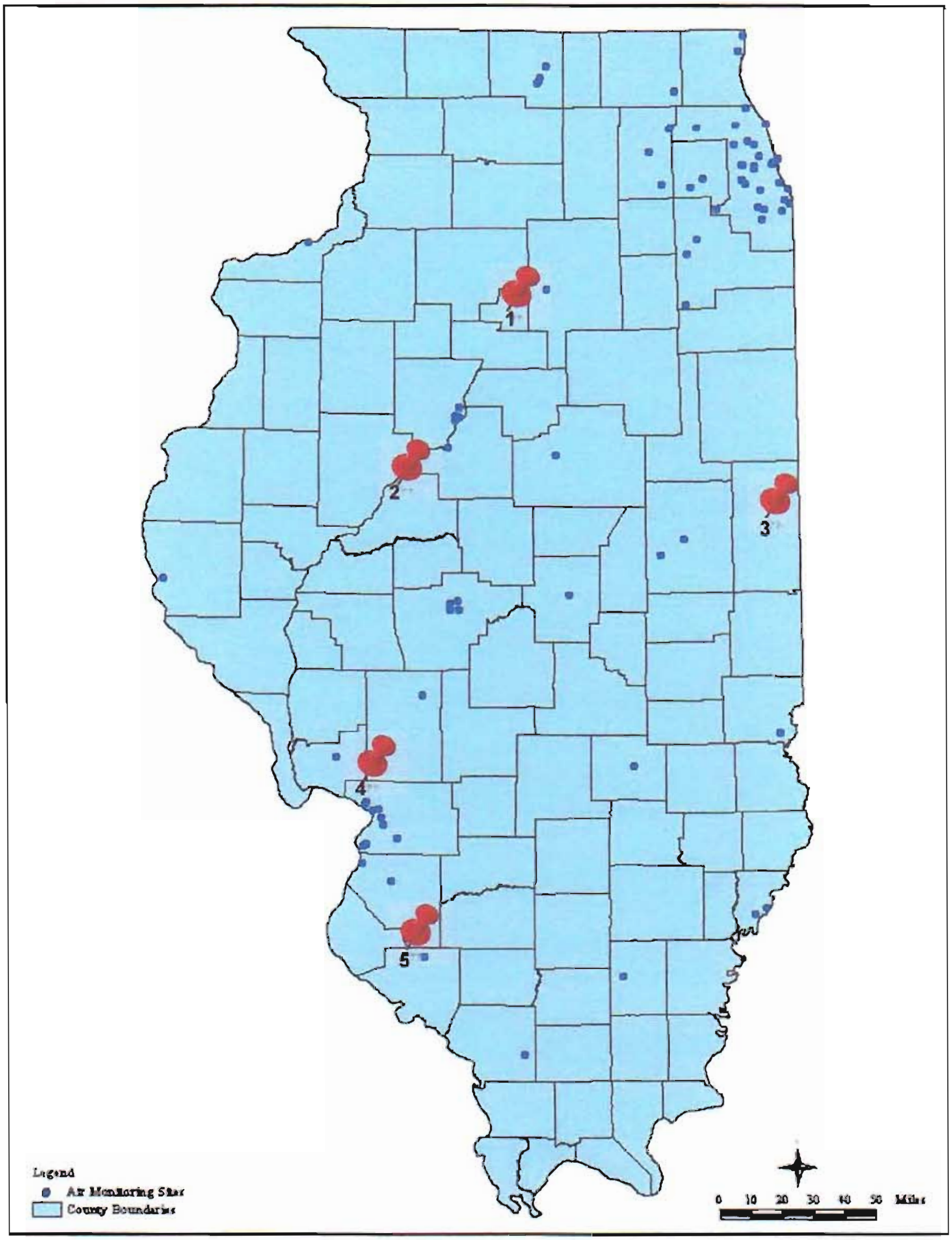

EXHIBIT 3

Table of Information About Each of the Power Stations

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address Number of Employees	Boilers and Sizes			Pollution Control Equipment[1]	Emissions in Rate and Tons Per Year (tpy)[2]	Permits issued, issuance dates, application numbers, and other relevant information[3]
Baldwin Energy Complex (Site I.D. No. 157851AAA)						
10901 Baldwin Road Baldwin, IL 62217 Randolph County Baldwin Township 199 employees	Unit 1 Net Load 600 MW Cyclone Fired Boiler w/ Wet Bottom Ash (7/13/1970)	Unit 2 Net Load 600 MW Cyclone Fired Boiler w/ Wet Bottom Ash (5/21/1973)	Unit 3 Net Load 600 MW Tangentially Fired Boiler w/ Dry Bottom Ash (6/20/1975)	Units 1 and 2 OFA, SCR, ESP, SDA (scrubber), Baghouse, and Hg control. Unit 3 Low-NO_x Burners, OFA, ESP, SDA (scrubber), Baghouse, and ACI. Note: SDA and Baghouse for Unit 2 are to be operational by 12/31/2012.	Unit 1 SO_2: 0.37 lb/mmBtu, 7,377 tpy. NOx: 0.05 lb/mmBtu, 1,102 tpy. PM: 0.04 lb/mmBtu, 876 tpy. Hg: 1.61 lb/TBtu, 0.032 tpy. Unit 2 SO_2: 0.41 lb/mmBtu, 9,480 tpy. NOx: 0.05 lb/mmBtu, 1,215 tpy. PM: 0.03 lb/mmBtu, 722 tpy. Hg: 1.03 lb/TBtu, 0.024 tpy. Unit 3 SO_2: 0.16 lb/mmBtu,	State Operating Permits: Unit 1 Issued August 17, 2000 Application No. 73010750 Unit 2 Issued August 11, 2000 Application No. 73010751 Unit 3 Issued June 26, 1997 Application No. 75040091 Construction Permits: Issued March 3, 2008 Application No. 07110065 Baghouse, Scrubber, and Sorbent Injection Systems for Unit 3; Appealed April 9, 2008 (PCB 08-66) Partial Stay Granted May 15, 2008

[1] OFA – Over Fire Air, SCR – Selective Catalytic Reduction, ESP – Electrostatic Precipitator, FGC – Flue Gas Conditioning, SDA – Spray Dryer Absorber, ACI – Activated Carbon Injection

[2] Calculations are based on January 1, 2010 through December 31, 2011 averaging. Heat inputs were measured by the unit's continuous emission monitoring system. [Mercury and PM emission rates were taken from 2010 and 2011 DAPC Annual Emission Reports.]

[3] Only the significant air permits for the main boilers are identified. DMG has received other operating permits and construction permits for the Stations for projects and equipment not relevant to the petition.

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address Number of Employees	Boilers and Sizes			Pollution Control Equipment[1]	Emissions in Rate and Tons Per Year (tpy)[2]	Permits issued, issuance dates, application numbers, and other relevant information[3]
Baldwin Energy Complex (Site I.D. No. 157851AAA)						
					3,477 tpy. NOx: 0.09 lb/mmBtu, 1,951 tpy. PM: 0.004 lb/mmBtu, 86 tpy. Hg: 0.94 lb/TBtu, 0.02 tpy.	Issued June 19, 2008 Application No. 08020075 Baghouse, Scrubber, and Sorbent Injection Systems for Units 1 and 2; Appealed July 29, 2008 (PCB 09-9) Partial Stay Granted August 21, 2008 <u>CAAPP Permit</u>: Submitted September 6, 1995 Application No. 95090026 Issued September 29, 2005 Expires September 29, 2010 Appealed November 3, 2005 (PCB 06-063) Stayed February 16, 2006

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address **Number of Employees**	**Boilers and Sizes**	**Pollution Control Equipment**[1]	**Emissions in Rate and Tons Per Year (tpy)**[2]	**Permits issued, issuance dates, application numbers, and other relevant information**[3]
Havana Power Station (Site I.D. No. 125804AAB)				
15260 North State Route 78 Havana, IL 62644 Mason County Havana Township 79 employees	Unit 6 (Boiler 9) Net Load 424 MW Opposed Horizontally Fired Boiler w/ Dry Bottom Ash (6/22/1978)	Unit 6 Low-NO_x Burners, OFA, SCR, Hot-side ESP w/ FGC, SDA (scrubber), Baghouse, and ACI. Note: SDA for Unit 6 is to be operational by 12/31/2012.	Unit 6 SO_2: 0.42 lb/mmBtu, 7,641 tpy. NOx: 0.05 lb/mmBtu, 866 tpy. PM: 0.001 lb/mmBtu, 9 tpy. Hg: 0.25 lb/TBtu, 0.045 tpy.	State Operating Permit: Unit 6 (Boiler 9) Issued March 22, 2000 Application No. 78110004 Construction Permits: Issued April 16, 2007 Application No. 07010031 Baghouse, Scrubber, and Sorbent Injection Systems for Unit 6; Appealed August 22, 2007 (PCB 07-115) Partial Stay Granted October 4, 2007 CAAPP Permit: Submitted September 7, 1995 Application No. 95090053 Issued September 29, 2005 Expires September 29, 2010 Appealed November 3, 2005 (PCB 06-071) Stayed February 16, 2006

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address Number of Employees	Boilers and Sizes		Pollution Control Equipment[1]	Emissions in Rate and Tons Per Year (tpy)[2]	Permits issued, issuance dates, application numbers, and other relevant information[3]
Hennepin Power Station (Site I.D. No. 155010AAA)					
13498 E. 800 St. Hennepin, IL 61327 Putnam County Hennepin Township 61 employees	Unit 1 Net Load 70 MW Tangentially Fired Boiler w/ Dry Bottom Ash (6/1/1953)	Unit 2 Net Load 221 MW Tangentially Fired Boiler w/ Dry Bottom Ash (5/14/1959)	Unit 1 OFA, ESP, Baghouse, and ACI. Unit 2 Low-NO_x Burners, OFA, ESP, Baghouse, and ACI.	Unit 1-2 SO_2: 0.50 lb/mmBtu, 6,117 tons/yr. NOx: 0.13 lb/mmBtu, 1,609 tpy. PM: 0.0085 lb/mmBtu, 105 tpy. Hg: 0.45 lb/TBtu, 0.0055 tpy.	State Operating Permit: Unit 1 Issued September 30, 2002 Application No. 73010752 Unit 2 Issued September 30, 2002 Application No. 73010721 Construction Permits: Issued May 29, 2007 Application No. 07020036 Baghouse and Sorbent Injection Systems for Units 1 and 2; Appealed October 4, 2008 (PCB 07-123) Partial Stay Granted November 1, 2007 CAAPP Permit: Submitted September 7, 1995 Application No. 95090052 Issued September 29, 2005 Expires September 29, 2010 Appealed November 3, 2005 (PCB 06-072) Stayed February 16, 2006

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address Number of Employees	Boilers and Sizes		Pollution Control Equipment[1]	Emissions in Rate and Tons Per Year (tpy)[2]	Permits issued, issuance dates, application numbers, and other relevant information[3]
Vermilion Power Station (Site I.D. No. 183814AAA) -- Vermilion Power Station was permanently retired in November 2011 and the permits identified below have been withdrawn					
10188 East 2150 North Road Oakwood, IL 61858 Crawford County Pilot Township 3 employees	Unit 1 Net Load 65 MW Tangentially Fired Boiler w/ Dry Bottom Ash (5/19/1955)	Unit 2 Net Load 99 MW Tangentially Fired Boiler w/ Dry Bottom Ash (11/25/1956)	Unit 1 Rotating OFA, ESP, Baghouse, and ACI. Unit 2 Low-NO_x Burners, OFA, ESP, Baghouse, and ACI.	Unit 1-2 SO_2: 0.51 lb/mmBtu, 1,310 tpy NOx: 0.25 lb/mmBtu, 634 tpy. PM: 0.003 lb/mmBtu, 7 tpy. Hg: 0.64 lb/TBtu, 0.002 tpy.	State Operating Permit: Unit 1 Issued November 25, 1997 Application No. 73020064 Unit 2 Issued November 25, 1997 Application No. 73020063 Construction Permits: Issued May 30, 2006 Application No. 06030002 Baghouse and Sorbent Injection Systems for Units 1 and 2; Appealed October 3, 2006 (PCB 06-194) Partial Stay Granted October 19, 2006 CAAPP Permit: Submitted September 7, 1995 Application No. 95090050 Issued September 29, 2005 Expires September 29, 2010 Appealed November 3, 2005 (PCB 06-073) Stayed February 16, 2006

Power Stations and Units Comprising the MPS Group
(§ 104.204(b))

Address Number of Employees	Boilers and Sizes		Pollution Control Equipment[1]	Emissions in Rate and Tons Per Year (tpy)[2]	Permits issued, issuance dates, application numbers, and other relevant information[3]
Wood River Power Station (Site I.D. No. 119020AAE)					
#1 Chessen Lane Alton, IL 62002 Madison County Alton Township 90 employees	Unit 4 Net Load 85 MW Tangentially Fired Boiler w/ Dry Bottom Ash (6/1/1954)	Unit 5 Net Load 372 MW Tangentially Fired Boiler w/ Dry Bottom Ash (7/31/1964)	Unit 4 Low-NO_x Burners, OFA, and ESP w/ FGC (as needed). Unit 5 Low-NO_x Burners, OFA, ESP, and ACI. Note: The Unit 4 Hg control system is to be operational in 2013.	Unit 4 SO_2: 0.51 lb/mmBtu, 2,107 tpy. NOx: 0.13 lb/mmBtu, 517 tpy. PM: 0.0235 lb/mmBtu, 876 tpy. Hg: 4.9 lb/TBtu, 0.02 tpy. Unit 5 SO_2: 0.50 lb/mmBtu, 7,054 tpy NOx: 0.15 lb/mmBtu, 2,103 tpy. PM: 0.013 lb/mmBtu, 185 tpy. Hg: 1.23 lb/TBtu, 0.018 tpy	State Operating Permit: Unit 4 Issued April 19, 2002 Application No. 73020062 Unit 5 Issued March 10, 1997 Application No. 73010719 Construction Permits: Issued June 12, 2008 Application No. 08020011 Sorbent Injection System for Unit 5; Appealed July 21, 2008 (PCB 09-6) Partial Stay Granted August 21, 2008 CAAPP Permit: Submitted September 7, 1995 Application No. 95090096 Issued September 29, 2005 Expires September 29, 2010 Appealed November 3, 2005 (PCB 06-074) Stayed February 16, 2006

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EXHIBIT 4

Table of Information About the Illinois Air Quality Monitoring Stations Closest to the DMG Power Stations

and

Excerpts from the 2010 Illinois EPA Air Quality Report

Electronic Filing - Received, Clerk's Office, 06/08/2012
* * * * * PCB 2012-135 * * * * *

SUMMARY OF NEAREST IEPA AIR MONITORING LOCATIONS

DMG Power Station	Name	AQS ID	Address	Equipment
Baldwin Energy Complex	**IEPA Trailer**	17-157-0001	Hickory Grove & Fallview, Houston	O3; PM2.5; SO2
Havana Power Station	**Fire Station #3**	17-179-0004	272, Derby, Pekin	SO2
Hennepin Power Station		17-099-0007	308 Portland Ave., Oglesby	PM10 (continuous); PM2.5; PM2.5 AQI; SO2; Wind System
Vermilion Power Station	Booker T. Washington Elementary School	17-019-0004	606 E. Grove Road, Champaign	O3; PM2.5
Wood River Power Station	Clara Barton Elementary School	17-119-0008	409 Main Street, Alton	O3
	SIU Dental Clinic	17-119-2009	1700 Annex. St. Alton	PM2.5
	Water Treatment Plant	17-119-3007	54 N. Walcott, Wood River	O3; PM10;PM2.5; SO2;TSP Pb, Metals

SUMMARY OF NEAREST IEPA MERCURY MONITORING LOCATIONS

DMG Power Station	Name	AQS ID	Address	Equipment
Baldwin Energy Complex	Northbrook Water Plant	17-031-4201	750 Dundee Road, Northbrook	SPMS - Hg, TOX, TSP
Havana Power Station	Northbrook Water Plant	17-031-4201	750 Dundee Road, Northbrook	SPMS - Hg, TOX, TSP
Hennepin Power Station	Northbrook Water Plant	17-031-4201	750 Dundee Road, Northbrook	SPMS - Hg, TOX, TSP
Vermilion Power Station	Northbrook Water Plant	17-031-4201	750 Dundee Road, Northbrook	SPMS - Hg, TOX, TSP
Wood River Power Station	Northbrook Water Plant	17-031-4201	750 Dundee Road, Northbrook	SPMS - Hg, TOX, TSP

Statewide Air Monitoring Site Locations

ID	NAME	XCOORD	YCOORD	AIRS CODE
0	Alsip Village Garage	439028.14	4613506.98	170310001
1	Aurora Health Department	389528.14	4626729.16	170890007
2	Blue Island Eisenhower H.S.	442015.58	4612496.03	170312001
3	Braidwood Comm ED Maintenance	400173.37	4564033.85	171971011
4	Cary Grove H.S.	397480.49	4675110.16	171110001
5	Cicero IEPA Trailer	437539.20	4633977.12	170314002
6	Cicero Liberty School	437852.27	4634984.05	170316005
7	Des Plaines Regional Office Building	428543.56	4656797.88	170314007
8	Elgin Larsen Junior H.S.	394651.06	4656017.29	170890006
9	Elgin McKinley School	394074.74	4656164.53	170890003
10	Evanston Water Pumping Station	444223.82	4656857.88	170317002
11	Joliet Pershing Elementary School	406854.40	4597853.20	171971002
12	Joliet Water Plant Well	401280.73	4590491.30	171970013
13	Lemont IEPA Trailer	417538.46	4613403.03	170311601
14	Lisle Morton Arboretum	410890.76	4629582.92	170436001
15	Lyons Township Village Hall	430877.97	4628039.70	170311016
16	Maywood 1500 Maybrook Drive Platform	431442.68	4635917.35	170316008
17	Maywood Comm ED Maintenance	431199.07	4635910.07	170316004
18	Maywood 4th District Court Building	431466.96	4635994.08	170316006
19	Midlothian Bremen H.S.	440382.95	4607283.07	170311901
20	Naperville City Hall	404209.07	4625007.66	170434002
21	Northbrook Water Plant	433953.24	[illegible]	170314201
22	Schiller Park IEPA Trailer	427390.48	[illegible]	170313101
23	Summit Graves Elementary School	433134.91	[illegible]	170313301
24	Waukegan North Fire Station	430740.20	[illegible]	170971002
25	Zion Camp Logan	433408.66	4702013.47	170971007
26	Chicago Carver H.S.	450923.96	4611812.47	170310060
27	Chicago Central Pump Station	446450.82	4635956.70	170310026
28	Chicago Comm ED	440680.96	4622421.39	170310075
29	Chicago Jardine Water Plant	449590.78	[illegible]8386.72	170310072
30	Chicago Willis Tower	447259.38	[illegible]6533.43	170310042
31	Chicago CTA Building	447307.[illegible]	[illegible]6384.48	170310063
32	Chicago South Water Filtration Plant	454702.37	4622802.04	170310032
33	Chicago Southeast Police Station	452696.62	4617465.15	170310050
34	Chicago Springfield Pump Station	440063.88	4640354.22	170310057
35	Chicago Taft H.S.	434390.00	4648367.48	170311003
36	Chicago University of Chicago	450011.00	4626726.33	170310064
37	Chicago Washington H.S.	455116.70	4615183.98	170310022
38	Chicago Mayfair Pump Station	437859.32	4646216.44	170310062
39	Bondville SWS Climate Station	[illegible].63	4434458.00	170191001
40	Carbondale Maintenance Building	[illegible]288.88	4177389.00	170770004
41	Champaign Booker T. Washington Elementary School	393236.97	4447722.50	170190004
42	Decatur IEPA Trailer	335319.94	4414769.00	171150013
43	Effingham Central Junior H.S.	366000.19	4325369.00	170491001
44	Houston Baldwin Site 2 - IEPA Trailer	255745.52	4229049.50	171570001
45	Knight Prairie Township	357489.72	4216177.00	170650002
46	Maryville Southwest Cable TV	242682.59	4290595.00	171191009
47	Mount Carmel Division Street	412441.06	4250177.00	171850001
48	Rural Wabash County South of State Route 1	427[illegible]	[illegible]	171851001
49	Milwood IEPA Trailer	[illegible]043.88	4364498.50	171170002
50	Normal ISU Physical Plant	[illegible]	4487250.50	171132003
51	Oglesby IEPA Trailer	[illegible]401.31	4573311.00	170990007
52	Peoria City Office Building	281616.22	4508336.50	171430037
53	Pekin Fire Station 3	275274.31	4492892.00	171790004
54	Peoria Commercial Building	279203.50	4506748.50	171430036
55	Peoria Fire Station 8	279707.38	4507329.50	171430024
56	Peoria Heights H.S.	281679.94	4513723.50	171431001
57	Loves Park Maple Elementary School	332121.41	4688981.00	172012004
58	Rockford City Hall	327811.72	4681606.50	172010011
59	Rockford Winnebago County Health Department	327237.36	4681107.00	172010013
60	Springfield Sewage Treatment Plant	278158.08	4408840.50	171670006
61	Springfield Public Health Warehouse	277126.53	4413724.50	171670010
62	Springfield Illinois Agriculture Building	273728.00	4412449.00	171670012
63	Springfield Federal Building	273312.59	4408832.50	171670008
64	Swansea Village Maintenance Building	239082.08	4268828.00	171634001
65	Bartonville Pump Station	276519.00	4503674.00	171430110
66	Decatur Mueller	334988.00	4414303.00	171150110
67	Mapleton Caterpillar Plant	267429.00	4493834.00	171430210
68	Perez Elementary School	445348.00	4633988.00	170310110
69	Rockford J. Rubin and Company	327440.00	4678637.00	172010110
70	Sterling Sauk Medical Clinic	275084.00	4629822.00	171950110
71	Alton SIU Dental Clinic	747734.94	[illegible]	171192009
72	Alton Clara Barton Elementary School	747358.56	[illegible]	171190008
73	East St. Louis RAPS Trailer	747238.69	427[illegible]1.00	171630010
74	Edwardsville RAPS Trailer	757101.44	[illegible]7.00	171192007
75	Granite City Fire Station 1	748777.[illegible]	[illegible]	171191007
76	Granite City Air Products	747522.88	4286713.50	171190010
77	Rock Island Arsenal	707169.75	4598886.00	171613002
78	South Roxana Grade School	[illegible]	4301836.50	171191010
79	Wood River Water Treatment Plant	751122.13	4305295.00	171193007
80	Jerseyville Illini Junior H.S.	731349.00	4332451.50	170831001
81	Quincy John Wood Community College	642227.44	4419695.50	170010007
82	Granite City Gateway Medical	748300.44	4287426.50	171190024
83	Springfield Blandco Building	277036.77	4413835.99	171670013

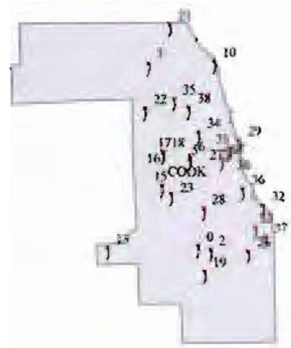

Table A3
2010 Site Directory

AQS ID	County	City	Address	CBSA / MSA / Area Represented	Latitude Longitude	Owner / Operator
17-001-0007	Adams	Quincy	John Wood Comm. College 1301 South 48th St.	Quincy, IL-MO	+39.91540937 -91.33586832	IL EPA
17-019-1001	Champaign	Bondville	State Water Survey Township Rd. 500 E.	Champaign-Urbana, IL	+40.05224171 -88.37254916	IL EPA/SWS
17-019-0004	Champaign	Champaign	Booker T. Wash. Elem Sch. 606 E. Grove	Champaign-Urbana, IL	+40.1237962 -88.22953098	IL EPA
17-031-0001	Cook	Alsip	Village Garage 4500 W. 123rd St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.6709919 -87.7324569	CCDEC
17-031-2001	Cook	Blue Island	Eisenhower High School 12700 Sacramento	Chicago-Naperville-Michigan City, IL-IN-WI	+41.66210943 -87.69646652	CCDEC
17-031-0060	Cook	Chicago	Carver High School 13100 S. Doty	Chicago-Naperville-Michigan City, IL-IN-WI	+41.65651756 -87.58957389	CCDEC
17-031-0026	Cook	Chicago	Cermak Pump Station 735 W. Harrison	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87372041 -87.64532569	CCDEC
17-031-0076	Cook	Chicago	Com Ed Maintenance Bldg. 7801 Lawndale	Chicago-Naperville-Michigan City, IL-IN-WI	+41.75139998 -87.71348815	CCDEC
17-031-0063	Cook	Chicago	CTA Building 320 S. Franklin	Chicago-Naperville-Michigan City, IL-IN-WI	+41.877628 -87.635027	IL EPA
17-031-0072	Cook	Chicago	Jardine Water Plant 1000 E. Ohio	Chicago-Naperville-Michigan City, IL-IN-WI	+41.89581227 -87.60768329	IL EPA
17-031-0052	Cook	Chicago	Mayfair Pump Station 4850 Wilson Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.96548483 -87.74992806	CCDEC
17-031-0110	Cook	Chicago	Perez Elementary School 1241 19th St.	H.G. Kramer	+41.855917 -87.658419	CCDEC
17-031-0050	Cook	Chicago	Southeast Police Station 103rd & Luella	Chicago-Naperville-Michigan City, IL-IN-WI	+41.70756959 -87.56857386	CCDEC
17-031-0032	Cook	Chicago	South Water Filtration Plant 3300 E. Cheltenham Pl.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.75583241 -87.54534967	CCDEC
17-031-0057	Cook	Chicago	Springfield Pump Station 1745 N. Springfield Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.91286212 -87.72272345	CCDEC
17-031-1003	Cook	Chicago	Taft High School 6545 W. Hurlbut St	Chicago-Naperville-Michigan City, IL-IN-WI	+41.98433233 -87.7920017	CCDEC
17-031-0064	Cook	Chicago	University of Chicago 5720 S. Ellis Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.79078688 -87.60164649	CCDEC
17-031-0022	Cook	Chicago	Washington High School 3535 E. 114th St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.68716544 -87.53931548	CCDEC
17-031-0042	Cook	Chicago	Willis Tower Wacker at Adams	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87898018 -87.63555553	IL EPA
17-031-4002	Cook	Cicero	Cook County Trailer 1820 S. 51st Ave	Chicago-Naperville-Michigan City, IL-IN-WI	+41.85524313 -87.7524697	CCDEC
17-031-6005	Cook	Cicero	Liberty School 13th St. & 50th Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.86442642 -87.74890238	CCDEC
17-031-4007	Cook	Des Plaines	Regional Office Building 9511 W. Harrison St	Chicago-Naperville-Michigan City, IL-IN-WI	+42.06028469 -87.86322543	IL EPA

Table A3
2010 Site Directory

AQS ID	County	City	Address	CBSA / MSA / Area Represented	Latitude Longitude	Owner / Operator
17-031-7002	Cook	Evanston	Water Pumping Station 531 E. Lincoln	Chicago-Naperville-Michigan City, IL-IN-WI	+42.06185724 -87.67416716	IL EPA
17-031-1601	Cook	Lemont	Cook County Trailer 729 Houston	Chicago-Naperville-Michigan City, IL-IN-WI	+41.66812034 -87.99056969	CCDEC
17-031-1016	Cook	Lyons Township	Village Hall 50th St & Glencoe	Chicago-Naperville-Michigan City, IL-IN-WI	+41.80116701 -87.8319447	IL EPA
17-031-6003	Cook	Maywood	4th District Court Building 1500 Maybrook Dr.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87220158 -87.8261648	CCDEC
17-031-6006	Cook	Maywood	4th District Court Building 1500 Maybrook Dr.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.8728972 -87.82587249	CCDEC
17-031-6004	Cook	Maywood	Com Ed Maintenance 1505 S. First Ave	Chicago-Naperville-Michigan City, IL-IN-WI	+41.87211684 -87.82908025	CCDEC
17-031-1901	Cook	Midlothian	Breman High School 15205 Crawford Ave	Chicago-Naperville-Michigan City, IL-IN-WI	+41.61503786 -87.71556004	CCDEC
17-031-4201	Cook	Northbrook	Northbrook Water Plant 750 Dundee Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.13999619 -87.79922692	IL EPA
17-031-3103	Cook	Schiller Park	IEPA Trailer 4743 Mannheim Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.96519348 -87.87626473	IL EPA
17-031-3301	Cook	Summit	Graves Elementary School 60th St. & 74th Ave.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.78276601 -87.80537679	CCDEC
17-043-6001	DuPage	Lisle	Morton Arboretum Route 53	Chicago-Naperville-Michigan City, IL-IN-WI	+41.81304939 -88.0728269	IL EPA
17-043-4002	DuPage	Naperville	City Hall 400 S. Eagle St.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.77107094 -88.15253365	IL EPA
17-049-1001	Effingham	Effingham	Central Junior High School Route 45 South	Effingham, IL	+39.06715932 -88.54893401	IL EPA
17-065-0002	Hamilton	Knight Prairie	Ten Mile Cree DNR Office State Route 14	Mt. Vernon, IL	+38.08215516 -88.6249434	IL EPA
17-077-0004	Jackson	Carbondale	Maintenance Building 607 E. College	Carbondale, IL	+37.72308571 -89.20928881	IL EPA/SIU
17-083-1001	Jerseyville	Jerseyville	Illini Junior High School Liberty St. & County Rd.	St. Louis, MO-IL	+39.11053947 -90.32407986	IL EPA
17-089-0007	Kane	Aurora	Health Department 1240 N. Highland	Chicago-Naperville-Michigan City, IL-IN-WI	+41.78471651 -88.32937361	IL EPA
17-089-0005	Kane	Elgin	Larsen Junior High School 665 Dundee Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.04914776 -88.27302929	IL EPA
17-089-0003	Kane	Elgin	McKinley School 258 Lovell St.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.050403 -88.28001471	IL EPA
17-097-1002	Lake	Waukegan	North Fire Station Golf & Jackson Sts.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.3867056 -87.84140622	IL EPA
17-097-1007	Lake	Zion	Camp Logan Illinois Beach State Park	Chicago-Naperville-Michigan City, IL-IN-WI	+42.4675733 -87.81004705	IL EPA
17-099-0007	La Salle	Oglesby	308 Portland Ave.	Ottawa-Streator, IL	+41.29301454 -89.04942498	IL EPA

Table A3

2010 Site Directory

AQS ID	County	City	Address	CBSA / MSA / Area Represented	Latitude Longitude	Owner / Operator
17-115-0013	Macon	Decatur	IEPA Trailer 2200 N. 22nd	Decatur, IL	+39.86683389 -88.92559445	IL EPA
17-115-0110	Macon	Decatur	Mueller 1226 E. Garfield	Mueller	+39.862542 -88.940694	IL EPA
17-117-0002	Macoupin	Nilwood	IEPA Trailer Heaton & Dubois	St. Louis, MO-IL	+39.39607533 -89.80973892	IL EPA
17-119-0008	Madison	Alton	Clara Barton Elementary School 409 Main St.	St. Louis, MO-IL	+38.89018605 -90.14803114	IL EPA
17-119-2009	Madison	Alton	SIU Dental Clinic 1700 Annex St.	St. Louis, MO-IL	+38.90308534 -90.14318803	IL EPA
17-119-2007	Madison	Edwardsville	RAPS Trailer Poag Rd.	St. Louis, MO-IL	+38.795235 -90.039756	IL EPA
17-119-0010	Madison	Granite City	Air Products 15th & Madison	St. Louis, MO-IL	+38.69443831 -90.15395426	IL EPA
17-119-1007	Madison	Granite City	Fire Station #1 23rd & Madison	St. Louis, MO-IL	+38.70453426 -90.13967484	IL EPA
17-119-0024	Madison	Granite City	Gateway Medical Center 2100 Madison Ave.	St. Louis, MO-IL	+38.7006315 -90.14476267	IL EPA
17-119-1009	Madison	Maryville	Southwest Cable TV 200 W. Division	St. Louis, MO-IL	+38.72657262 -89.95996251	IL EPA
17-119-1010	Madison	South Roxana	South Roxana Grade School Michigan St.	St. Louis, MO-IL	+38.82830334 -90.05843262	IL EPA
17-119-3007	Madison	Wood River	Water Treatment Plant 54 N. Walcott	St. Louis, MO-IL	+38.86066947 -90.10585111	IL EPA
17-111-0001	McHenry	Cary	Cary Grove High School 1st St. & Three Oaks Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+42.22144166 -88.24220734	IL EPA
17-113-2003	McLean	Normal	ISU Physical Plant Main & Gregory	Bloomington-Normal, IL	+40.51873537 -88.99689571	IL EPA
17-143-0110	Peoria	Bartonville	Pump Station Sanitation Rd.	Keystone Steel & Wire	+40.653703 -89.643375	IL EPA
17-143-0210	Peoria	Mapleton	Residential 9725 W. Wheeler Rd.	Caterpillar-Mapleton Plant	+40.562633 -89.747114	IL EPA
17-143-0037	Peoria	Peoria	City Office Building 613 N.E. Jefferson	Peoria, IL	+40.697007 -89.58473722	IL EPA
17-143-0036	Peoria	Peoria	Commercial Building 1005 N. University	Peoria, IL	+40.70007197 -89.61341375	IL EPA
17-143-0024	Peoria	Peoria	Fire Station #8 MacArthur & Hurlburt	Peoria, IL	+40.68742038 -89.60694277	IL EPA
17-143-1001	Peoria	Peoria Heights	Peoria Heights High School 508 E. Glen Ave.	Peoria, IL	+40.74550393 -89.58586902	IL EPA
17-157-0001	Randolph	Houston	IEPA Trailer Hickory Grove & Fallview	Houston, IL	+38.17627761 -89.78845862	IL EPA
17-161-3002	Rock Island	Rock Island	Rock Island Arsenal 32 Rodman Ave.	Davenport-Moline-Rock Island, IA-IL	+41.51472697 -90.51735026	IL EPA
17-167-0012	Sangamon	Springfield	Agricultural Building State Fair Grounds	Springfield, IL	+39.83192087 -89.64416359	IL EPA
17-167-0013	Sangamon	Springfield	Blandco Building 3050 Mayden Rd.	Springfield, IL	+39.845356 -89.597457	IL EPA
17-167-0008	Sangamon	Springfield	Federal Building 6th St. & Monroe	Springfield, IL	+39.7993092 -89.64760789	IL EPA
17-167-0010	Sangamon	Springfield	Public Health Warehouse 2875 N. Dirkson Parkway	Springfield, IL	+39.84412188 -89.60483919	IL EPA

Table A3

2010 Site Directory

AQS ID	County	City	Address	CBSA / MSA / Area Represented	Latitude Longitude	Owner / Operator
17-167-0006	Sangamon	Springfield	Sewage Treatment Plant 3300 Mechanicsburg Rd.	Springfield, IL	+39.80061377 -89.59122532	IL EPA
17-163-0010	St. Clair	East St. Louis	RAPS Trailer 13th & Tudor	St. Louis, MO-IL	+38.61203448 -90.16047663	IL EPA
17-163-4001	St. Clair	Swansea	Village Maintenance Building 1500 Caseyville Ave.	St. Louis, MO-IL	+38.52963143 -89.99284962	IL EPA
17-179-0004	Tazewell	Pekin	Fire Station #3 272 Derby	Peoria, IL	+40.55646017 -89.65402807	IL EPA
17-185-0001	Wabash	Mount Carmel	Division St.	Gibson County, IN-Mt. Carmel, IL	+38.397276 -87.773631	Indiana
17-185-1001	Wabash	Rural Wabash County	South of State Route 1	Gibson County, IN-Wabash County, IL	+38.369498 -87.834466	Indiana
17-195-0110	Whiteside	Sterling	Sauk Medical Clinic 705 West 3rd St.	Sterling Steal Co.	+41.788383 -89.706728	IL EPA
17-197-1011	Will	Braidwood	Com Ed Training Center 36400 S. Essex Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.22153707 -88.19096718	IL EPA
17-197-1002	Will	Joliet	Pershing Elementary School Midland & Campbell Sts.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.52688509 -88.11647381	IL EPA
17-197-0013	Will	Joliet	Water Plant West Route 6 & Young Rd.	Chicago-Naperville-Michigan City, IL-IN-WI	+41.45996344 -88.18201915	IL EPA
17-201-2001	Winnebago	Loves Park	Maple Elementary School 1405 Maple Ave.	Rockford, IL	+42.33498222 -89.0377748	IL EPA
17-201-0011	Winnebago	Rockford	City Hall 425 E. State	Rockford, IL	+42.26767353 -89.08785092	IL EPA
17-201-0013	Winnebago	Rockford	Health Department 201 Division St.	Rockford, IL	+42.26308105 -89.09276716	IL EPA
17-201-0110	Winnebago	Rockford	J. Rubin & Company 305 Peoples Ave.	Gunite Corporation	+42.240867 -89.091467	IL EPA

Table A4

2010 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-001-0007	Quincy															
17-019-0004	Champaign															
17-019-1001	Bondville															
17-031-0001	Alsip															
17-031-0022	Chicago Washington High School					C										
17-031-0026	Chicago Cermak Pump Station															
17-031-0032	Chicago South Water Filtration															
17-031-0042	Chicago Willis Tower															
17-031-0050	Chicago Southeast Police Station															
17-031-0052	Chicago Mayfair Pump Station															
17-031-0057	Chicago Springfield Pump Station															
17-031-0060	Chicago Carver High School															
17-031-0063	Chicago CTA Building															
17-031-0064	Chicago University of Chicago															
17-031-0072	Chicago Jardine Water Plant															
17-031-0076	Chicago Com Ed Maintenance															
17-031-0110	Chicago Perez Elementary															
17-031-1003	Chicago Taft High School															
17-031-1016	Lyons Township					C										
17-031-1601	Lemont															
17-031-1901	Midlothian															
17-031-2001	Blue Island															

Active Monitor	Site/Monitor Installed	Site/Monitor Removed	C = Continuous PM10 T = Trace level monitor

Table A4
2010 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-031-3103	Schiller Park															
17-031-3301	Summit															
17-031-4002	Cicero Cook County Trailer															
17-031-6005	Cicero Liberty School															
17-031-4007	Des Plaines															
17-031-4201	Northbrook[1]	T								T						
17-031-6003	Maywood 4th District Court															
17-031-6004	Maywood Com Ed Maintenance															
17-031-6006	Maywood 4th District Court															
17-031-7002	Evanston															
17-043-4002	Naperville															
17-043-6001	Lisle															
17-049-1001	Effingham															
17-065-0002	Knight Prairie															
17-077-0004	Carbondale															
17-083-1001	Jerseyville															
17-089-0003	Elgin McKinley School															
17-089-0005	Elgin Larsen Jr. High School															
17-089-0007	Aurora															
17-097-1002	Waukegan															
17-097-1007	Zion	.														
17-099-0007	Oglesby					C										

Active Monitor | Site/Monitor Installed | Site/Monitor Removed

C = Continuous PM10
T = Trace level monitor
1 = Northbrook also measures continuous mercury

Table A4

2010 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-111-0001	Cary															
17-113-2003	Normal															
17-115-0013	Decatur IEPA Trailer															
17-115-0110	Decatur Mueller															
17-117-0002	Nilwood															
17-119-0008	Alton Clara Barton Elementary															
17-119-2009	Alton SIU Dental Clinic															
17-119-0010	Granite City Air Products															
17-119-0024	Granite City Gateway Medical Center															
17-119-1007	Granite City Fire Station #1					C										
17-119-1009	Maryville															
17-119-1010	South Roxana															
17-119-2007	Edwardsville															
17-119-3007	Wood River															
17-143-0024	Peoria Fire Station #8															
17-143-0036	Peoria Commercial Building															
17-143-0037	Peoria City Office Building															
17-143-0110	Bartonville															
17-143-0210	Mapleton															
17-143-1001	Peoria Heights															
17-157-0001	Houston															
17-161-3002	Rock Island															

Active Monitor	Site/Monitor Installed	Site/Monitor Removed	C = Continuous PM10 T = Trace level monitor

Table A4

2010 Monitoring Directory

AQS ID	City	CO	CO2	NO2	Ozone	PM10	PM2.5	PM2.5 AQI	PM2.5 Speciation	SO2	VOC	Toxics	TSP Pb, Metals	Wind System	Solar	Meteorological
17-163-0010	East St. Louis															
17-163-4001	Swansea															
17-167-0006	Springfield Sewage Treatment Plant															
17-167-0008	Springfield Federal Building															
17-167-0010	Springfield Public Health															
17-167-0012	Springfield Agricultural Building															
17-167-0013	Springfield Blandco Building															
17-179-0004	Pekin															
17-185-0001	Mount Carmel															
17-185-1001	Rural Wabash County															
17-195-0110	Sterling															
17-197-0013	Joliet Water Plant West															
17-197-1002	Joliet Pershing Elementary															
17-197-1011	Braidwood															
17-201-0011	Rockford City Hall															
17-201-0013	Rockford Health Department															
17-201-0110	Rockford J. Rubin & Company															
17-201-2001	Loves Park															

Active Monitor	Site/Monitor Installed	Site/Monitor Removed	C = Continuous PM10 T = Trace level monitor

EXHIBIT 5

Letter from Dynegy Midwest Generation, LLC to Raymond Pilapil, Illinois EPA

Notice of Intent to Participate in the MPS

(November 26, 2007)

Keith McFarland
Vice President
Midwest Fleet Operations

Dynegy Generation
A Division of Dynegy Inc
3890 North Illinois Street
Swansea, Illinois 62226

November 26, 2007

DYNEGY

Mr. Raymond Pilapil
Manager
Compliance & Enforcement Section
Illinois EPA
Bureau of Air
PO Box 19276
Springfield, Illinois 62794-9276

Re: CAIR Rule - 35 IAC 225
Notice of Intent to Participate in MPS

Dear Mr. Pilapil:

Dynegy Midwest Generation, Inc. (DMG) is giving notice of its intent to elect its units in the Multi-Pollutant Standards group as per Section 225.233 as its means of complying with Subpart B of Part 225. The following information accompanies this notification:

1. The identification of each EGU that will be complying with this Subpart B by means of the multi-pollutant standards contained in this Section, with evidence that the owner has identified all EGUs that it owned in Illinois as of July 1, 2006 and which commenced commercial operation on or before December 31, 2004;
2. The Base Emission Rates for the EGUs, with copies of supporting data and calculations;
3. A summary of the current control devices installed and operating on each EGU and identification of the additional control devices that will likely be needed to comply with emission control requirements of this Section, including identification of each EGU in the MPS group that will be addressed by subsection (c)(1)(B) of this Section, with information showing that the eligibility criteria for this subsection (b) are satisfied.

This information is in the attachments to this letter. Attachment 1 lists all the units (EGUs) owned by Dynegy Midwest Generation, Inc. that utilize coal in Illinois. All of the units were owned before July 1, 2006 and began operation before December 31, 2004. Attachment 2 lists the Base Emission Rate for the EGUs (values from 2003, 2004 and 2005). Attachment 3 gives a table of the control devices currently installed and future installations. Future installations are indicated with a proposed date. EGUs addressed by subsection (c)(1)(B) are identified along with gross generation and percent generation of the MPS group.

This letter also serves as notice under 225.270 and 40CFR Part 75.61 that Hennepin (ORIS 892) Unit 1 and Unit 2 are served and monitored by a common stack. Vermilion (ORIS 897) Unit 1 and Unit 2 are also served and monitored by a common stack.

"I am authorized to make this submission on behalf of the owners and operators of the NOX Budget sources or NOX Budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

Sincerely,
DYNEGY MIDWEST GENERATION, INC.

Keith A. McFarland
Vice President
Midwest Fleet Operations

Attachments

Attachment 1

EGUs owned by Dynegy Midwest Generation, Inc. and elected for MPS

Station	Unit ID	ORIS	Date of Commercial Operation	Gross Generation [1] (GMW)
Baldwin	1	889	7/13/70	624
Baldwin	2	889	5/21/73	629
Baldwin	3	889	6/20/75	629
Havana	9	891	6/22/78	487
Hennepin	1	892	6/1/53	81
Hennepin	2	892	5/14/59	240
Vermilion	1	897	5/19/55	84
Vermilion	2	897	5/25/56	113
Wood River [2]	4	898	6/1/54	105
Wood River	5	898	7/31/64	383
			Total Generation	3375

[1] Gross Generation as listed in the Consent Decree.

[2] The Gross Generation for Wood River Unit ~~for~~ 4 is less than 4% of the total Gross Generation for the MPS group (225.233 (c)(1)(b))

Attachment 2

Base Emission Rates and calculations

	lb/mmBtu			Tons			mmBtu		
	2003	2004	2005	2003	2004	2005	2003	2004	2005
Seasonal NOx	0.209	0.102	0.087	9704	3824	4360	92894369	74936571	99783984
Annual NOx	0.261	0.215	0.096	28455	23281	10639	218427022	216363263	221703763
Annual SO2	0.583	0.562	0.491	63622	60806	54394	218427022	216363263	221703763

Values taken from IEPA handout which indicates values obtained from USEPA Clean Air Markets Division

Average Values

Program	Average Rate	Reduction	Limit
Seasonal NOx	0.133	20%	**0.106**
Annual NOx	0.191	48%	**0.099**
Annual SO2 P1 2013-2014	0.545	56%	**0.240**
Annual SO2 P2	0.545	65%	**0.191**

Attachment 3

Table of Control Devices

Station	Unit ID	ESP	Fabric Filter	SCR	Spray Dryer Absorber	ACI
Baldwin	1	X	2011	X	2011	2009
Baldwin	2	X	2012	X	2012	2009
Baldwin	3	X	2010		2010	2009
Havana	9	X	2009	X	2009 - 2010	2009
Hennepin	1	X	2008			2009
Hennepin	2	X	2008			2009
Vermilion	1	X	X			X
Vermilion	2	X	X			X
Wood River [3]	4	X				
Wood River	5	X				2009

X = Device currently installed
Future installation indicated by date of anticipated operation.

[3] Wood River Unit 4 (ORIS 898) is electing to use (c)(1)(b) of Subpart B of Part 225.233

EXHIBIT 6

Letter from Dynegy Inc. to Bobby Rush, U.S. Congressman

EPA's Cross-State Air Pollution Rule

(September 12, 2011)

Robert C. Flexon
President and Chief Executive Officer

Dynegy Inc.
1000 Louisiana Street, Suite 5800
Houston, Texas 77002
Phone 713-767-0907 - Fax 713-356-2019
robert.c.flexon@dynegy.com

DYNEGY

September 12, 2011

Hon. Bobby Rush, Ranking Member
Energy and Power Subcommittee
Committee on Energy and Commerce
U.S. House of Representatives
2268 Rayburn House Office Building
Washington, D.C. 20515

Re: EPA's Cross-State Air Pollution Rule

Dear Congressman Rush:

We understand that the Energy and Power Subcommittee will be holding a hearing on Sept. 14 on EPA power-sector rules, including the Cross-State Air Pollution Rule (CSAPR), and reliability concerns. CSAPR, as you know, is a Clean Air Act rule focusing on interstate air emissions from electric generating units. We wanted to offer the following remarks for the record in order to make clear the position of Dynegy Inc on CSAPR. While we would note that the rule can be improved through technical corrections, we are supportive of the rule.

We fully understand the perception that the rule works some unfairness on certain business interests. However, we want you to know that this is not a uniformly-held position in the power sector; rather, it is a reflection of particular investment decisions. Having made different decisions (particularly with respect to our Illinois facilities), we have made substantial capital investments in state-of-the-art air pollution control devices. Any efforts to delay or derail CSAPR would undermine the reasonable, investment-backed expectations of Dynegy.

As an Illinois constituent, Dynegy provides wholesale power, capacity and ancillary services to utilities, cooperatives, municipalities and other energy companies in six states in our key U.S. regions of the Midwest, the Northeast and the West Coast. Dynegy's power generation portfolio consists of approximately 11,600 megawatts of baseload, intermediate and peaking power plants fueled by a mix of coal, fuel oil and natural gas. Our geographic, dispatch and fuel diversity contribute to a portfolio that is well-positioned to capitalize on regional differences in power prices and weather-driven demand to the benefit of consumers and businesses.

The orderly and predictable implementation of CSAPR actually removes business uncertainty in the electric power sector that was created when the federal courts invalidated the forerunner to CSAPR known as the Clean Air Interstate Rule. Like other capital-intensive industries, the power sector thrives and creates jobs in situations of certainty. In our case, CSAPR allows competitive markets to confer deserved economic returns on our investments in clean energy technology - investments made as a result of corporate policy, the operation of applicable law in the states in which we operate, and additional federal requirements. Dynegy's 3000 megawatts of generating assets in Illinois, enough to power roughly three million homes, are mostly coal-fired, base and intermediate-load facilities. These coal-fired operations employ about 700 individuals. Our capital investment in clean air technologies at these coal facilities totals about one billion dollars since EPA finalized CAIR in March 2005.

Your hearing addresses reliability. Our electric generation facilities in Illinois - facilities that do indeed burn coal but which have the most modern air emission controls - are an important part of the backbone of affordable and reliable power in the state. Reserve margins in the transport rule Midwest Group I states, where Dynegy coal-fired facilities are located, exceed target reserve levels. And EPA has adopted reasonable regulatory approaches under CSAPR, including allowing for both intrastate and interstate trading. For these reasons, Dynegy believes that delaying implementation of the CSAPR in Midwest/Group I states, is not necessary. Reliability concerns should be taken seriously. But the fact is that a responsible approach to implementation, the emergency authorities already available to energy regulators, and some prompt technical corrections to the rule, should be sufficient to resolve near-term concerns. Over the longer term, the sooner well-controlled facilities become the norm, the sooner we will resolve any tension between reliability and protection of human health and the environment.

Of course, it goes without saying that control of interstate air pollution serves important public policy objectives, including protection of human health and the environment as well as the preservation of opportunities for economic development in downwind communities.

Thank you for this opportunity to make our position known. The bottom line is that those corporations that have invested in effective air pollution control devices were counting on a stable regulatory environment. While no one suggests that CSAPR is perfect, its continued progress towards implementation is important for that stability.

Very truly yours,

Robert C Flexon

Robert C. Flexon

cc: Hon. Ed Whitfield, Chairman
Energy and Power Subcommittee
Committee on Energy and Commerce

lrw/2011-0912

EXHIBIT 7

USEPA's TSD in the CSAPR Rulemaking

Assessment of Impact of Consent Decree Annual Tonnage Limits on CSAPR Allocations

(October 4, 2011)

Technical Support Documentation (TSD)

for the proposed Revisions to Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone

Docket ID No. EPA-HQ-OAR-2011-0491

Assessment of Impact of Consent Decree Annual Tonnage Limits on CSAPR Allocations

U.S. Environmental Protection Agency

Office of Air and Radiation

10/4/11

This Technical Support Document (TSD) provides information that supports EPA's analysis of the impact of emission constraints specified in existing federally-enforceable judicial consent decrees (referred to hereafter as consent decrees) on allowance allocations under the Transport Rule. The analysis is described in section III.B of the preamble to the proposed Revisions to Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone. This TSD is organized as follows:

1. Overview
2. Annual tonnage limits and shut down requirements
   a. Apportioning the annual tonnage limits for unit-level allocations
   b. Unit-level caps for Transport Rule units affected by a consent decree annual tonnage limit or shut down requirement
3. Emission rate limits

1. Overview

As discussed in section III.B. of the proposed Revisions to Federal Implementation Plans to Reduce Interstate Transport of Fine Particulate Matter and Ozone preamble, EPA properly incorporated emission reduction requirements specified in consent decrees into state budgets calculations.[1] However, after the final Transport Rule was published, EPA determined that the unit-level allowance allocations under the Transport Rule FIPs did not properly account for those consent decree provisions. Some of the consent decree provisions effectively require the surrender, or restrict the trading, of "excess" Transport Rule allowances. As a result, Transport Rule allowance allocations to certain units may unintentionally reduce the availability of some of those allowances to other sources due to the consent decree restrictions on the use and/or transfer of those allowances by the unit receiving the allocation. EPA analyzed three general consent decree provisions to determine their impact on Transport Rule allowance allocations and state budgets. The first of these provisions was an annual tonnage limit (ATL) expressed as the maximum allowable mass emissions per year from a system or facility as defined in the consent decree. The ATL is, in essence, an annual cap on system- or facility-wide mass emissions. The second provision was a forced shut down or repowering to natural gas of one or more units. The third provision was a maximum emission rate, typically expressed in pounds per million Btu (lb/mmBtu) of heat input. If a consent decree includes surrender or trading restriction provisions, any allowances allocated in excess of an ATL or mass emissions constraint (i.e., the maximum emission rate multiplied by the actual heat input) would not be available to other sources for compliance, effectively reducing the state budget. Similarly, allowances allocated to a unit that shut down due to consent decree requirements would not be available to other sources for compliance.

EPA developed an approach to resolve this inconsistency by adding a constraint on unit-level allocations. This constraint aligns unit-level allocations for units affected by consent decree ATLs with the consent decree ATLs by preventing heat input-based allocations from exceeding the terms of the ATLs for SO_2 and/or NO_x.

[1] The consent decree with Northern Indiana Public Service Company (NIPSCO) was finalized after EPA determined, and was not reflected in, the relevant base case projections and state budget in the final Transport Rule. However, EPA believes it is appropriate to address the NIPSCO consent decree because it will otherwise result in removal of a portion of the relevant state budget that was intended to be available for use in complying with Transport Rule emission reduction requirements.

EPA first reviewed the 22 consent decrees for U.S. coal-fired power plants (a full list is available at: http://www.epa.gov/compliance/resources/cases/civil/caa/coal/index.html) to determine if the consent decrees: a) apply to Transport Rule-affected units, b) apply to Transport Rule SO_2, annual NO_x, or ozone season NO_x allowances, or c) contain ATLs, shut down provisions, and/or maximum emission rates. EPA determined that 19 of the 22 consent decrees apply to units in the Transport Rule region and 16 consent decrees may apply to allowances of one or more Transport Rule programs – five to Transport Rule SO_2 allowances, 13 to Transport Rule NO_x annual allowances, and 15 to Transport Rule NO_x ozone season allowances. Table 1 summarizes the applicability of the consent decrees to Transport Rule-affected units and Transport Rule allowances.

Table 1 – Applicability of Consent decrees on Transport Rule allowances

Utility consent decree	Units in TR region	TR SO_2 allowances	TR NO_x annual allowances	TR NO_x ozone season allowances
Tennessee Valley Authority	Yes	Yes	Yes	Yes
Northern Indiana Public Service Company	Yes	No [1]	Yes	Yes
Hoosier Energy Rural Electric Cooperative	Yes	Yes	Yes	Yes
American Municipal Power	Yes	Yes	Yes	Yes
Westar Energy	Yes	Yes	Yes	Yes
Duke Energy	Yes	Yes	No [2]	No [2]
Ohio Edison Company	Yes	No [1]	Yes	Yes
Kentucky Utilities	Yes	No [1]	No [3]	No [3]
Salt River Project Agricultural Improvement and Power District	No	No	No	No
American Electric Power Service Corporation	Yes	No [1]	No [4]	No [4]
East Kentucky Power Cooperative	Yes	No [1]	Yes [5]	Yes [5]
Nevada Power Company	No	No	No	No
Alabama Power Company	Yes	No [1]	No [2]	No [2]
Minnkota Power Cooperative	No	No	No	No
Illinois Power Company	Yes	No [1]	Yes	Yes
South Carolina Public Service Authority	Yes	No [1]	Yes	Yes
Southern Indiana Gas and Electric Company	Yes	No [1]	Yes [5]	Yes [5]
Wisconsin Electric Power Company	Yes	No [1]	Yes	Yes
Virginia Electric Power Company	Yes	No [1]	Yes [5]	Yes [5]
ALCOA	Yes	No [1]	Yes	Yes
PSEG Fossil	Yes	No [1]	No [6]	Yes
Tampa Electric Company	Yes [7]	N/A [7]	N/A [7]	Yes

1 Limited to Title IV allowances.
2 Does not include NO_x allowance constraints.
3 Limited to NO_x ozone season allowances allocated or issued by the state of Kentucky.
4 Limited to Clean Air Interstate Rule (CAIR) allowances.
5 No definition is provided for NO_x allowances so EPA assumed the broadest definition possible.
6 Limited to NO_x ozone season allowances.
7 Affected units are not included in the Transport Rule SO_2 or NO_x annual program.

2. Annual tonnage limits and shut down requirements

After determining the applicability of a consent decree on Transport Rule-affected units and Transport Rule allowances (see Table 1), EPA determined the potential impact of ATLs and shut down requirements. For the purpose of analyzing the potential impact of consent decree emission constraints, EPA applied an implicit ATL of zero to units that are required to shut down. Similarly, if a unit is required to repower to natural gas EPA applied an implicit ATL of zero for SO_2.

To determine the potential impact of the system- and facility-wide ATLs, EPA compared the ATL expressed in tons per year to the system or facility's annual Transport Rule allowance allocations as determined using the approach in the Final Transport Rule (76 FR 48287 and 48289-90) and listed in the "Final CSAPR Unit Level Allocations under the FIP" (http://www.epa.gov/crossstaterule/actions.html). Because some ATLs decline from year-to-year, EPA assessed the potential impact on each year through 2016. For all but two consent decrees, the ATLs remain constant after 2016. This date also provide states sufficient time to prepare and submit State Implementation Plans (SIPs) that include allowance allocation methodologies. For Tennessee Valley Authority (TVA) and Hoosier Energy Rural Electric Cooperative (Hoosier) consent decrees, the ATLs continue to decline until 2019 and 2017, respectively. Therefore, EPA assessed the potential impact of those two consent decrees until the ATLs remain constant (i.e., 2019 for TVA and 2017 for Hoosier). EPA determined that six consent decrees contain ATLs lower than the aggregate Transport Rule allowance allocations listed in the "Final CSAPR Unit Level Allocations under the FIP" for the affected units – one for SO_2, annual NO_X, and ozone season NO_X emissions ; one for SO_2 and annual NO_X emissions; two for SO_2 emissions; and two for annual NO_X emissions. The detailed results are presented in Tables 2 – 13.

In Tables 2 – 13, the allocation column represents the aggregate Transport Rule SO_2 or NO_X annual allowance allocations listed in the "Final CSAPR Unit Level Allocations under the FIP" for those units affected by the consent decree ATL. The ATL column is the system- or facility-wide SO_2 or NO_X ATL for the units affected by the consent decree. The surplus allocation column is the number of allowances from the allocation column in excess of the limit in the ATL column. If EPA determined the consent decree did not apply to Transport Rule SO_2 or NO_X annual allowances, no assessment is shown below.

Table 2 – Tennessee Valley Authority: Potential impact of annual tonnage limits						
	SO_2			Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation	Allocation	ATL (tons)	Surplus allocation
2012	250,105	285,000	None	70,461	100,600	None
2013	250,105	235,518	14,587	70,461	90,791	None
2014	128,819	228,107	None	52,469	86,842	None
2015	128,819	220,631	None	52,469	83,042	None
2016	128,819	175,626	None	52,469	70,667	None
2017	128,819	164,257	None	52,469	64,951	None
2018	128,819	121,699	7,120	52,469	52,000	469
2019	128,819	110,000	18,819	52,469	52,000	469

Table 3 – Northern Indiana Public Service Company: Potential impact of annual tonnage limits			
	Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation
2012	15,060	15,537	None
2013	15,060	13,752 [1]	1,308
2014	14,880	13,464 [1]	1,416
2015	14,880	12,870 [1]	2,010
2016	14,880	12,870 [1]	2,010

[1] The ATL is based on the utility's plans to install SNCR at R.M. Schahfer and SCR at Michigan City. If the utility pursues alternatives allowed in the consent decree, the ATLs vary between 15,247 tons and 11,704 tons.

Table 4 – Hoosier Energy Rural Electric Cooperative: Potential impact of annual tonnage limits						
	SO_2			Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation	Allocation	ATL (tons)	Surplus allocation
2012	20,881	28,500	None	7,731	5,869	1,862
2013	20,881	27,000	None	7,731	5,395	2,336
2014	11,550	26,000	None	7,639	5,395	2,244
2015	11,550	19,889	None	7,639	4,800	2,839
2016	11,550	19,889	None	7,639	4,800	2,839
2017	11,550	18,750 [1]	None	7,639	4,800	2,839

[1] The ATL declines to 15,500 tons if one of the F.E. Ratt units is retired or repowered.

Table 5 – American Municipal Power: Potential impact of annual tonnage limits						
	SO_2			Annual NO_X		
Year	Allocation	ATL (tons)	Surplus allocation	Allocation	ATL (tons)	Surplus allocation
2012	3,663	21,000	None	1,065	2,100	None
2013	3,663	0 [1]	3,663	1,065	0 [1]	1,065
2014	1,587	0 [1]	1,587	1,004	0 [1]	1,004
2015	1,587	0 [1]	1,587	1,004	0 [1]	1,004
2016	1,587	0 [1]	1,587	1,004	0 [1]	1,004

1 The R.H. Gorsuch facility must shut down or repower.

Table 6 – Westar Energy: Potential impact of annual tonnage limits						
	SO_2			Annual NO_X		
Year	Allocation	ATL (tons)	Surplus allocation	Allocation	ATL (tons)	Surplus allocation
2012	16,565	6,600	9,965	11,529	None	None
2013	16,565	6,600	9,965	11,529	None	None
2014	16,565	6,600	9,965	9,580	12,400	None
2015	16,565	6,600	9,965	9,580	12,400	None
2016	16,565	6,600	9,965	9,580	9,600	None

Table 7 – Duke Energy: Potential impact of annual tonnage limits [1]			
	SO_2		
Year	Allocation	ATL (tons)	Surplus allocation
2012	2,987	20,447	None
2013	2,987	0 [2]	2,987
2014	1,652	0 [2]	1,652
2015	1,652	0 [2]	1,652
2016	1,652	0 [2]	1,652

1 The consent decree ATL applies to Gallagher Unit 1 and Unit 3 only.

2 Gallagher Units 1 & 3 must be retired or repowered by 2013.

Table 8 – Ohio Edison Company: Potential Impact of annual tonnage limits			
	Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation
2012	9,835	11,863	None
2013	9,835	11,863	None
2014	9,279	11,863	None
2015	9,279	11,863	None
2016	9,279	11,863	None

[1] The consent decree ATL applies to WH Sammis only.

Table 9 – East Kentucky Power Cooperative: Potential impact of annual tonnage limits			
	Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation
2012	6,934	11,500	None
2013	6,934	8,500	None
2014	6,285	8,500	None
2015	6,285	8,500	None
2016	6,285	8,500	None

Table 10 – Illinois Power Company: Potential impact of annual tonnage limits			
	Annual NO_x		
Year	Allocation	ATL (tons)	Surplus allocation
2012	8,177	13,800	None
2013	8,177	13,800	None
2014	8,177	13,800	None
2015	8,177	13,800	None
2016	8,177	13,800	None

Table 11 – South Carolina Public Service Authority: Potential impact of annual tonnage limits			
	Annual NO_X		
Year	Allocation	ATL (tons)	Surplus allocation
2012	17,341	20,000	None
2013	17,341	20,000	None
2014	17,341	20,000	None
2015	17,341	20,000	None
2016	17,341	20,000	None

Table 12 – Wisconsin Electric Power Company: Potential impact of annual tonnage limits			
	Annual NO_X		
Year	Allocation	ATL (tons)	Surplus allocation
2012	12,970	23,400	None
2013	12,970	17,400	None
2014	12,439	17,400	None
2015	12,439	17,400	None
2016	12,439	17,400	None

Table 13 – Virginia Electric Power Company: Potential impact of annual tonnage limits			
	Annual NO_X		
Year	Allocation	ATL (tons)	Surplus allocation
2012	24,837	50,000	None
2013	24,837	30,250	None
2014	24,215	30,250	None
2015	24,215	30,250	None
2016	24,215	30,250	None

a) *Apportioning the annual tonnage limits for unit-level allocations*

The consent decrees that include a system- or facility-wide ATL do not apportion the limit to individual units affected by those consent decrees. However, Transport Rule allowances are allocated to individual units. Therefore, as described in section III.B of the proposed Revisions to Federal Implementation Plans to Reduce

Interstate Transport of Fine Particulate Matter and Ozone preamble, EPA developed a methodology for apportioning the consent decree system- or facility-wide ATL to the units affected by the ATL for 2012 and later years. The apportionment of a system- or facility-wide ATL is solely for the purposes of allocations of Transport Rule allowances and does not modify, or create additional, consent decree requirements or limitations.

To determine the unit-level caps for calculating allocations, EPA first calculated a ratio comparing the consent decree system- or facility-wide ATL to the aggregate allocations listed in the "Final CSAPR Unit Level Allocations under the FIP" for units covered by the consent decree ATL. EPA then multiplied this ratio by the unit-level allocation listed in the "Final CSAPR Unit Level Allocations under the FIP" for each unit covered by the system- or facility-wide ATL (equation 1).

Equation 1: Unit-level cap = $\left(\frac{A}{B}\right) X\ C$

Where A = Applicable consent decree system- or facility-wide ATL

B = For units affected by the consent decree ATL, the sum of the unit-level allocations listed in the "Final CSAPR Unit Level Allocations under the FIP"

C = Applicable unit-level Transport Rule allocation listed in the "Final CSAPR Unit Level Allocations under the FIP"

This can be best illustrated with an example. In this example, EPA determines that facility ABC consists of two units – Unit 1 and Unit 2 – that are subject to the Transport Rule annual NO_X program and a consent decree ATL for NO_X emissions. The consent decree ATL for 2012 is 3,000 tons of NO_X and the 2012 NO_X annual allowance allocation as determined using the approach in the Final Transport Rule is 4,000 allowances for Unit 1 and 2,000 allowances to Unit 2 – a total of 6,000 allowances. Because, in this example, EPA determined the consent decree surrender provisions apply to Transport Rule NO_X annual allowances, any allocation in excess of the ATL may be subject to surrender, reducing the number of allowances available for sources to comply with the Transport Rule, effectively reducing the state budget.

EPA must calculate unit-level caps for Unit 1 and Unit 2 by apportioning the consent decree ATL. First, the ATL is divided by the sum of the unit-level allocations as determined using the approach in the Final Transport Rule (3,000 / 6,000 = 0.5). This ratio is then multiplied by each unit's allocation as determined using the approach in the Final Transport Rule to determine the respective unit's unit-level cap (Unit 1: 0.5 X 4,000 = 2,000 and Unit 2: 0.5 X 2,000 = 1,000).

b) Unit-level caps for Transport Rule units affected by a consent decree annual tonnage limit or shut down requirement

Unit-level caps were calculated only for units affected by a consent decree ATL that is below the sum of the unit-level allocations listed in the "Final CSAPR Unit Level Allocations under the FIP" for those units. In other words, unit-level caps were not calculated for units for which the ATL is greater than the aggregate allocations listed in the "Final CSAPR Unit Level Allocations under the FIP", such as the East Kentucky Power Cooperative consent decree units (see table 9). The results of EPA's calculations are listed in Tables 14 – 16 for SO_2, annual NO_X, and ozone season NO_X emissions , respectively.

Utility consent decree	Plant Name	State	ORIS	Boiler ID	Unit-level caps (annual NO_X tons)							
					2012	2013	2014	2015	2016	2017	2018	2019
TVA	Bull Run	Tennessee	3396	1							1,584	1,584
TVA	Cumberland	Tennessee	3399	1							2,735	2,735
TVA	Cumberland	Tennessee	3399	2							2,725	2,725
TVA	Gallatin	Tennessee	3403	1							550	550
TVA	Gallatin	Tennessee	3403	2							564	564
TVA	Gallatin	Tennessee	3403	3							628	628
TVA	Gallatin	Tennessee	3403	4							650	650
TVA	John Sevier	Tennessee	3405	1							368	368
TVA	John Sevier	Tennessee	3405	2							370	370
TVA	John Sevier	Tennessee	3405	3							376	376
TVA	John Sevier	Tennessee	3405	4							371	371
TVA	Johnsonville	Tennessee	3406	1							257	257
TVA	Johnsonville	Tennessee	3406	10							293	293
TVA	Johnsonville	Tennessee	3406	2							262	262
TVA	Johnsonville	Tennessee	3406	3							272	272
TVA	Johnsonville	Tennessee	3406	4							242	242
TVA	Johnsonville	Tennessee	3406	5							235	235
TVA	Johnsonville	Tennessee	3406	6							250	250
TVA	Johnsonville	Tennessee	3406	7							272	272
TVA	Johnsonville	Tennessee	3406	8							297	297
TVA	Johnsonville	Tennessee	3406	9							288	288
TVA	Kingston	Tennessee	3407	1							294	294
TVA	Kingston	Tennessee	3407	2							294	294
TVA	Kingston	Tennessee	3407	3							316	316
TVA	Kingston	Tennessee	3407	4							298	298
TVA	Kingston	Tennessee	3407	5							425	425
TVA	Kingston	Tennessee	3407	6							411	411
TVA	Kingston	Tennessee	3407	7							405	405
TVA	Kingston	Tennessee	3407	8							407	407
TVA	Kingston	Tennessee	3407	9							413	413
TVA	Widows Creek	Alabama	50	1							593	593
TVA	Widows Creek	Alabama	50	2							572	572
TVA	Widows Creek	Alabama	50	3							616	616
TVA	Widows Creek	Alabama	50	4							643	643
TVA	Widows Creek	Alabama	50	5							560	560
TVA	Widows Creek	Alabama	50	6							647	647
TVA	Widows Creek	Alabama	50	7							2,437	2,437
TVA	Widows Creek	Alabama	50	8							2,716	2,716

Table 15: EPA-calculated unit-level caps for purposes of calculating Transport Rule NO_x annual allowance allocations

Utility consent decree	Plant Name	State	ORIS	Boiler ID	Unit-level caps (annual NO_x tons)							
					2012	2013	2014	2015	2016	2017	2018	2019
AMP	R Gorsuch	Ohio	7253	1		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	2		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	3		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	4		0	0	0	0	0	0	0
Hoosier	FE Ratts	Indiana	1043	1SG1	550	506	506	451	451	451	451	451
Hoosier	FE Ratts	Indiana	1043	2SG1	578	532	532	473	473	473	473	473
Hoosier	Merom	Indiana	6213	1SG1	2,384	2,192	2,192	1,950	1,950	1,950	1,950	1,950
Hoosier	Merom	Indiana	6213	2SG1	2,357	2,165	2,165	1,926	1,926	1,926	1,926	1,926
NIPSCO	Bailly	Indiana	995	7		883	865	827	827	827	827	827
NIPSCO	Bailly	Indiana	995	8		1,517	1,485	1,419	1,419	1,419	1,419	1,419
NIPSCO	Michigan City	Indiana	997	12		2,112	2,068	1,977	1,977	1,977	1,977	1,977
NIPSCO	Michigan City	Indiana	997	4		0	0	0	0	0	0	0
NIPSCO	Michigan City	Indiana	997	5		0	0	0	0	0	0	0
NIPSCO	Michigan City	Indiana	997	6		0	0	0	0	0	0	0
NIPSCO	RM Schahfer	Indiana	6085	14		2,266	2,218	2,120	2,120	2,120	2,120	2,120
NIPSCO	RM Schahfer	Indiana	6085	15		2,671	2,616	2,501	2,501	2,501	2,501	2,501
NIPSCO	RM Schahfer	Indiana	6085	17		2,126	2,081	1,989	1,989	1,989	1,989	1,989
NIPSCO	RM Schahfer	Indiana	6085	18		2,177	2,131	2,037	2,037	2,037	2,037	2,037
TVA	Colbert	Alabama	47	1							1,115	1,115
TVA	Colbert	Alabama	47	2							1,069	1,069
TVA	Colbert	Alabama	47	3							1,094	1,094
TVA	Colbert	Alabama	47	4							1,066	1,066
TVA	Colbert	Alabama	47	5							2,162	2,162
TVA	Paradise	Kentucky	1378	1							3,141	3,141
TVA	Paradise	Kentucky	1378	2							3,323	3,323
TVA	Paradise	Kentucky	1378	3							4,466	4,466
TVA	Shawnee	Kentucky	1379	1							735	735
TVA	Shawnee	Kentucky	1379	10							628	628
TVA	Shawnee	Kentucky	1379	2							742	742
TVA	Shawnee	Kentucky	1379	3							746	746
TVA	Shawnee	Kentucky	1379	4							710	710
TVA	Shawnee	Kentucky	1379	5							737	737
TVA	Shawnee	Kentucky	1379	6							728	728
TVA	Shawnee	Kentucky	1379	7							769	769
TVA	Shawnee	Kentucky	1379	8							739	739
TVA	Shawnee	Kentucky	1379	9							717	717
TVA	Allen	Tennessee	3393	1							575	575
TVA	Allen	Tennessee	3393	2							549	549
TVA	Allen	Tennessee	3393	3							553	553

Utility consent decree	Plant Name	State	ORIS	Boiler ID	Unit-level caps (SO_2 tons)							
					2012	2013	2014	2015	2016	2017	2018	2019
TVA	Johnsonville	Tennessee	3406	10		2,660					860	777
TVA	Johnsonville	Tennessee	3406	2		2,373					767	693
TVA	Johnsonville	Tennessee	3406	3		2,470					798	722
TVA	Johnsonville	Tennessee	3406	4		2,200					711	643
TVA	Johnsonville	Tennessee	3406	5		2,134					690	623
TVA	Johnsonville	Tennessee	3406	6		2,271					734	663
TVA	Johnsonville	Tennessee	3406	7		2,462					795	719
TVA	Johnsonville	Tennessee	3406	8		2,696					872	788
TVA	Johnsonville	Tennessee	3406	9		2,614					845	763
TVA	Kingston	Tennessee	3407	1		2,675					864	781
TVA	Kingston	Tennessee	3407	2		2,670					863	780
TVA	Kingston	Tennessee	3407	3		2,869					928	839
TVA	Kingston	Tennessee	3407	4		2,705					875	791
TVA	Kingston	Tennessee	3407	5		3,862					1,248	1,128
TVA	Kingston	Tennessee	3407	6		3,736					1,207	1,091
TVA	Kingston	Tennessee	3407	7		3,684					1,190	1,076
TVA	Kingston	Tennessee	3407	8		3,695					1,194	1,079
TVA	Kingston	Tennessee	3407	9		3,754					1,213	1,096
TVA	Widows Creek	Alabama	50	1		1,771					1,752	1,583
TVA	Widows Creek	Alabama	50	2		1,709					1,690	1,528
TVA	Widows Creek	Alabama	50	3		1,844					1,823	1,648
TVA	Widows Creek	Alabama	50	4		1,921					1,900	1,717
TVA	Widows Creek	Alabama	50	5		1,672					1,653	1,494
TVA	Widows Creek	Alabama	50	6		1,934					1,912	1,728
TVA	Widows Creek	Alabama	50	7		7,284					7,204	6,511
TVA	Widows Creek	Alabama	50	8		6,463					6,484	5,860
Westar	Jeffrey Energy Center	Kansas	6068	1	2,270	2,270	2,270	2,270	2,270	2,270	2,270	2,270
Westar	Jeffrey Energy Center	Kansas	6068	2	2,197	2,197	2,197	2,197	2,197	2,197	2,197	2,197
Westar	Jeffrey Energy Center	Kansas	6068	3	2,133	2,133	2,133	2,133	2,133	2,133	2,133	2,133

Table 16: EPA-calculated unit-level caps for purposes of calculating Transport Rule NO_x ozone season allowance allocations												
Utility consent decree	Plant Name	State	ORIS	Boiler ID	Unit-level caps (ozone season NO_x tons)							
					2012	2013	2014	2015	2016	2017	2018	2019
AMP	R Gorsuch	Ohio	7253	1		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	2		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	3		0	0	0	0	0	0	0
AMP	R Gorsuch	Ohio	7253	4		0	0	0	0	0	0	0

2. Emission rate limits

Many of the consent decrees include other emission constraints such as maximum emission rates (e.g., pounds of NO_X per million Btu of heat input), pollution control installation and operation requirements, and pollution control performance specifications. EPA did not analyze the impact of the latter two constraints directly because EPA believes that the maximum emission rates are generally designed to be consistent with, and account for, these additional requirements.

EPA did estimate the potential impact of maximum emission rates on allocations of Transport Rule allowances. The impact of a maximum emissions rate on a unit's allowable mass emissions depends on the actual utilization of the unit involved in future years when the emission rate applies. The product of a maximum emissions rate (in lb/mmBtu) and the unit's actual future heat input (in mmBtu) is a mass emission value that, after conversion from pounds to tons, limits the use of the unit's allocated allowances. However, in order to estimate the potential impact of a unit's maximum emission rate on allowance allocations, EPA must make assumptions about each unit's future heat input. For the purpose of this analysis, EPA multiplied a unit's maximum emission rate as listed in the consent decree by the average of the respective unit's three highest non-zero annual or ozone season heat input values from 2006 to 2010. These are the same heat input values used for allocating allowance and listed in the "Final CSAPR Unit Level Allocations under the FIP".[2] The results of this analysis are shown in Tables 17 – 19 for SO_2, annual NO_X, and ozone season NO_X emissions, respectively.

EPA selected 2013 for this analysis because it represents the greatest potential impact of consent decree maximum emission rates because maximum emission rates do not begin for some units until 2013 and the 2012 – 2013 allowance allocations are generally greater than in future years (i.e., allowance allocations decline in 2014 for many units). EPA determined the maximum emission rates in the consent decrees potentially have the following impacts:

- Transport Rule SO_2 annual trading program: 4,335 SO_2 allowances may be affected, approximately 0.13% of the total allowances allocated.
- Transport Rule NO_X annual trading program: 1,585 NO_X annual allowances may be affected, approximately 0.13% of the total allowances allocated.

[2] In the case of the Hoosier Energy Rural Electric Cooperative consent decree, one unit at the Merom facility has the option of operating the FGD at a 95% removal efficiency or meeting an emission rate of 0.15 pounds per million Btu of heat input. Based on fuel purchase records reported to EIA for 2010 and 2011, the 95% removal efficiency equates to an emission rate of 0.27 pounds per million Btu and was used for this analysis.

- Transport Rule NO_X ozone season trading program: 1,123 NO_X ozone season allowances may be affected, approximately 0.19% of the total allowances allocated.

Based on this analysis of potential impact on allowance allocations, EPA concluded that the consent decree emission constraints other than ATLs would affect few allowances in the Transport Rule trading programs. Any effort to reallocate the allowances affected by maximum emission rate would require EPA to make assumptions about Individual units' future utilization and heat input. Because this would require the use of unit-level projections whose application in setting unit-level allocations would be difficult to support and because few allowances are potentially at risk, EPA chose not to adjust allocations to reflect maximum emission rates defined in the consent decrees.

In Tables 17 – 19 below, the allocation column represents the unit-level allocation of SO_2 or NO_X allowances listed in the "Final CSAPR Unit Level Allocations under the FIP" or, for units with a unit-level cap calculated by EPA, tables 14 – 16 of this document. The avg heat input column is the average of the three highest non-zero heat input values from 2006 – 2010 as listed in the "Final CSAPR Unit Level Allocations under the FIP" (tables 17 and 18 use the annual heat Input values and table 19 uses the ozone season heat input values). The emission rate is the maximum SO_2 or NO_X emission rate listed in a consent decree. The potential constraint is the product of the values from the average heat input and emission rate columns. The surplus allocation is the number of allowances in the allocation column in excess of the potential constraint column.

Table 17: Potential impact of consent decree SO_2 maximum emission rates on Transport Rule SO_2 allowance allocations

Utility consent decree	Plant Name	State	ORIS	Boiler ID	Allocation	Avg heat input	SO_2 emission rate	Potential constraint	Surplus allocation
Hoosier	Merom	Indiana	6213	1SG1	8582	38089260	0.272	5180	3402
Duke	R Gallagher	Indiana	1008	1	0	6521304	1.7	5543	None
Duke	R Gallagher	Indiana	1008	2	1658	7359549	0.6	2208	None
Duke	R Gallagher	Indiana	1008	3	0	6892599	1.7	5859	None
Duke	R Gallagher	Indiana	1008	4	1587	7045742	0.6	2114	None
Westar	Jeffrey Energy Center	Kansas	6068	1	2270	55683277	0.07	1949	321
Westar	Jeffrey Energy Center	Kansas	6068	2	2197	53900154	0.07	1887	310
Westar	Jeffrey Energy Center	Kansas	6068	3	2133	52319190	0.07	1831	302
TVA	Shawnee	Kentucky	1379	1	2220	10394599	1.2	6237	None
TVA	Shawnee	Kentucky	1379	10	1897	8884355	1.2	5331	None
TVA	Shawnee	Kentucky	1379	2	2240	10491296	1.2	6295	None
TVA	Shawnee	Kentucky	1379	3	2253	10551380	1.2	6331	None
TVA	Shawnee	Kentucky	1379	4	2142	10031659	1.2	6019	None
TVA	Shawnee	Kentucky	1379	5	2224	10415210	1.2	6249	None
TVA	Shawnee	Kentucky	1379	6	2197	10286868	1.2	6172	None
TVA	Shawnee	Kentucky	1379	7	2320	10867445	1.2	6520	None
TVA	Shawnee	Kentucky	1379	8	2231	10445226	1.2	6267	None
TVA	Shawnee	Kentucky	1379	9	2161	10119178	1.2	6072	None

EXHIBIT 8

Table of Calculations of Emission Reductions Associated with Various DMG Projects

Reductions in Emissions of SO_2 from Various Projects

SO2 REDUCTIONS FROM OUTAGES TO INSTALL AIR POLLUTION CONTROLS[1]

											Tons SO2
Vermilion Unit 1-2 Baghouse Outage: March 31 - May 30, 2007											
Jan-Mar SO2 Rate	Jan-Mar Ave. Monthly HI	April HI	HI Below Monthly Ave.	May HI	HI Below Monthly Ave.					Total HI Below Ave. Due to Outage	
0.454	797,223	251,716	545,507	239,171	558,052					1,103,559	251
Hennepin Unit 1-2 Baghouse Outage: September 5 – December 7, 2008											
Jan-Aug SO2 Rate	Jan-Aug Ave. Monthly HI	Sept. HI	HI Below Monthly Ave.	Oct. HI	HI Below Monthly Ave.	Nov. HI	HI Below Monthly Ave.	Dec. HI	HI Below Monthly Ave.	Total HI Below Ave. Due to Outage	
0.433	1,784,911	1,126,257	658,654	129,105	1,655,806	586,549	1,198,362	1,420,732	364,179	3,877,001	839
Havana Unit 6 Baghouse Outage: March 21 – June 11, 2009											
Jan-Feb SO2 Rate	Jan-Feb Ave. Monthly HI	March HI	HI Below Monthly Ave.	April HI	HI Below Monthly Ave.	May HI	HI Below Monthly Ave.	June HI	HI Below Monthly Ave.	Total HI Below Ave. Due to Outage	
0.439	2,824,238	1,723,341	1,100,897	--	2,824,238	--	2,824,238	1,725,957	1,098,281	7,847,654	1,723
Baldwin 3 SDA/Baghouse Outage: March 6 – May 29, 2010											
Jan-Feb SO2 Rate	Jan-Feb Ave. Monthly HI	March HI	HI Below Monthly Ave.	April HI	HI Below Monthly Ave.	May HI	HI Below Monthly Ave.			Total HI Below Ave. Due to Outage	
0.427	4,063,950	747,224	3,316,726	–	4,063,950	2,156	4,061,794			11,442,470	2,443
Baldwin 1 SDA/Baghouse Outage: September 3 – October 21, 2011											
Jan-Aug SO2 Rate	Jan-Aug Ave. Monthly HI	Sept. HI	HI Below Monthly Ave.	Oct. HI	HI Below Monthly Ave.					Total HI Below Ave. Due to Outage	
0.401	3,609,367	230,219	3,379,148	926,257	2,683,110					6,062,258	1,215

[1] SO2 Rate in lbs/mmBtu; HI - Heat Input in mmBtu.

Reductions in Emissions of SO_2 from Various Projects

Baldwin 2 SDA/Baghouse Planned Outage: September - November, 2012											
Jan-April SO2 Rate	Jan-April Ave. Monthly HI	Sept. HI (Estimated)	Sept. HI Below Monthly Ave.	Oct. HI (Estimated)	Oct. HI Below Monthly Ave.	Nov. HI (Estimated)	Nov. HI Below Monthly Ave.			Total HI Below Ave. Due to Outage (Estimate)	
0.365	3,796,955	1,759,809	2,037,146	0	3,796,955	1,803,524	1,993,431			7,827,532	1,428
										Total Outage SO2 Reductions Tons	7,899

Reductions in Emissions of SO_2 from Various Projects

SO2 REDUCTIONS FROM EARLY OPERATION OF SPRAY DRY ABSORBERS[2]

												Tons SO2
Baldwin 3 SDA Early Reductions: May 29 – December 31, 2010												
2009 Annual Average SO2 Rate	May 29 – December 31, 2010 SO2 Rate	SO2 Rate Below Prior Year Average	May 29 – December 31, 2010 Heat Input	SO2 Early Reduction – May 29 – December 31, 2010								
0.441	0.259	0.182	25,136,956	2,287								2,287
Baldwin 1 SDA Early Reductions: October 28 – December 31, 2011												
January 1 – September 3, 2011 Average SO2 Rate	October 28 – December 31, 2010 SO2 Rate	SO2 Rate Below YTD Ave.	October 28 – December 31, 2011 Heat Input	SO2 Early Reduction – October 28 – December 31, 2011								
0.407	0.194	0.213	8,214,421	875								875
Baldwin 2 SDA Early Reductions: Estimated December 1 – December 31, 2012												
January 1- April 30, 2012 Average SO2 Rate	Dec. HI (Estimated)	Dec. SO2 Rate – (Estimated)	SO2 Rate Below YTD Average	SO2 Early Reduction – December (Estimate)								
0.365	3,939,747	0.20	0.165	325								325
											Total Early SO2 Reduction Tons	3,487

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[2] SO2 Rate in lbs/mmBtu; HI - Heat Input in mmBtu.

Reductions in Emissions of SO_2 from Various Projects

SO2 REDUCTIONS ASSOCIATED WITH FIRST YEAR RETIREMENT OF VERMILION (one-time reduction)

Vermilion Units 1-2	Year	Tons SO2
	2008	2,464
	2009	2,080
	2010	2,092
	2008-2010 Annual Average SO2 Emissions Tons	2,212
	2011 Actual SO2 Emissions Tons	527
	2011 Tons SO2 Avoided	1,685

Reductions in Emissions of SO_2 from Various Projects

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SO2 REDUCTIONS ASSOCIATED WITH UNIT RETIREMENTS OR LOWER ALLOWABLE SO2 RATES

	lbs SO2/mmBtu Allowable Limit[3]	Max. Permitted mmBtu/hour	Permitted Hours per year	Tons SO2
Wood River Units 1-3	0.30	1,800	8,760	2,365
Havana Units 1-5	1	3,456	8,760	15,137
Wood River Unit 4	0.6	1,050	8,760	2,759
Wood River Unit 5	0.6	3,900	8,760	10,249
Vermilion Units 1-2	Year	Tons SO2		
	2008	2,464		
	2009	2,080		
	2010	2,092		
	2008-2010 Annual Average SO2 Emissions Tons	2,212		
	2012 and Each Year Beyond Tons SO2 Avoided	2,212		
	Total	2,212		2,212
			Total SO2 Reductions Tons	32,722

[3] For Wood River Units 4 and 5, the 0.6 allowable limit equals the difference between the 1.8 lbs/mmBtu state permitted limit and the 1.2 lbs/mmBtu Consent Decree limit.

EXHIBIT 9

Table of Estimated 2013-2014 Emissions Based upon the MPS Emission Rates Applied to 2007-2010 Average Heat Input

Estimated 2013-2014 Emissions (2007-2010 Average Heat Input; MPS Rates)

	Historic Heat Inputs					Annual SO2			
	2007	2008	2009	2010	2007-2010 Average	2013 MPS SO2 Rate Limit	2014 MPS SO2 Rate Limit	4-year Ave. Heat Input X 2013 MPS Rate Limit	4-year Ave. Heat Input X 2014 MPS Rate Limit
Plant-Unit	**HI (mmBtu)**	**HI (mmBtu)**	**HI (mmBtu)**	**HI (mmBtu)**	**HI (mmBtu)**	**#/mBtu**	**#/mBtu**	**Tons SO2/yr**	**Tons SO2/yr**
Baldwin - 1	46,380,578	38,900,402	42,376,555	42,860,896	42,629,608				
Baldwin - 2	47,540,266	47,395,104	34,951,999	46,480,910	44,092,070				
Baldwin - 3	43,852,241	44,255,109	43,656,836	34,012,081	41,444,067				
Havana - 6	35,776,465	30,758,031	22,274,295	35,225,775	31,008,641				
Hennepin - 1&2	22,260,280	17,541,935	23,845,751	25,002,481	22,162,612				
Wood River - 4	7,298,497	6,566,434	8,662,213	9,198,382	7,931,382				
Wood River - 5	21,950,221	26,505,556	27,155,888	28,923,045	26,133,678				
TOTAL	**225,058,548**	**211,922,571**	**202,923,537**	**221,703,570**	**215,402,056**	**0.240**	**0.240**	**25,848**	**25,848**

EXHIBIT 10

Letters from MISO, Inc. to Daniel P. Thompson, Dynegy Midwest Generation, LLC

Approval of Retirement of Certain Units

(October 20, 2011, and January 12, 2012)

MISO

Jeffrey R. Webb
Senior Director, Expansion Planning
Direct Dial: 317-249-5412
E-mail: jwebb@misoenergy.org

VIA OVERNIGHT DELIVERY

October 10, 2011

Mr. Daniel P. Thompson
Vice President and General Manager
Dynegy Midwest Generation, LLC
1000 Louisiana Ave
Suite 5800
Houston, TX 77002

Re: Wood River Units 1, 2 & 3

Dear Mr. Thompson:

Your completed Attachment Y form for the notification of potential generation resource change of status for Wood River units 1, 2 & 3 was received on September 7, 2011. After being reviewed for the power system reliability impacts as provided for under Section 38.2.7 of the MISO's Open Access Transmission, Energy & Operating Reserve Markets Tariff ("Tariff"), generators Wood River units 1, 2 & 3 may be retired without the need for the generators to be designated as System Support Resource ("SSR") units, as defined in the Tariff.

Please do not hesitate to contact me if you have any questions on this matter.

Sincerely,

Jeffrey R Webb

Jeffrey R. Webb

cc: Gary Brownfield, Supervisor, Ameren Transmission Planning
Kevin Sherd, Senior Manager, East & Central Regional Operations, MISO

MISO

Jeffrey R. Webb
Senior Director, Expansion Planning
Direct Dial: 317-249-5412
E-mail: jwebb@misoenergy.org

VIA OVERNIGHT DELIVERY

January 12, 2012

Mr. Dan Thompson
Vice President and General Manager
Dynegy Midwest Generation, LLC
1000 Louisiana Ave
Suite 5800
Houston, TX 77002

Re: Havana Units 1, 2, 3, 4 & 5

Dear Mr. Thompson:

Your completed Attachment Y form for the notification of potential generation resource change of status for Havana units 1, 2, 3, 4 & 5 was received on December 12, 2011. After being reviewed for the power system reliability impacts as provided for under Section 38.2.7 of the MISO's Open Access Transmission, Energy & Operating Reserve Markets Tariff ("Tariff"), generators Havana units 1, 2, 3, 4 & 5 may be retired without the need for the generators to be designated as System Support Resource ("SSR") units, as defined in the Tariff.

Please note that under Module E, units that are retired or mothballed are not eligible to be used as Planning Resources. If you have any questions please contact Carmen Clark at 317-249-5828 or Darrin Landstrom at 651-632-8524.

Please do not hesitate to contact me if you have any other questions on this matter.

Sincerely,

Jeffrey R. Webb

cc: Gary Brownfield, Supervisor, Ameren Transmission Planning
Kevin Sherd, Senior Manager, East & Central Regional Operations, MISO
Kevin Larson, Senior Manager Resource Adequacy, MISO

EXHIBIT 11

Portions of Illinois EPA's TSD Supporting the BART/Regional Haze SIP Submittal

Technical Support Document for Best Available Retrofit Technology Under the Regional Haze Rule

(April 29, 2011)

TECHNICAL SUPPORT DOCUMENT
FOR
BEST AVAILABLE RETROFIT TECHNOLOGY
UNDER THE REGIONAL HAZE RULE

AQPSTR 09-06

April 29, 2011

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 NORTH GRAND AVENUE EAST
P.O. BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

Table 3.4 List of Units Subject to BART

Source Name	Unit ID	Source Name	Unit ID
Dynegy Baldwin	Boiler #1	CITGO	Heater 115 B-2
Dynegy Baldwin	Boiler #2	CITGO	Heater 116 B-1
Dynegy Baldwin	Boiler #3	CITGO	Heater 116 B-2
Dominion Kincaid	Boiler #1	CITGO	Heater 116 B-3
Dominion Kincaid	Boiler #2	CITGO	Heater 116 B-4
Ameren Coffeen	Boiler CB-1	CITGO	Heater 118 B-1
Ameren Coffeen	Boiler CB-2	CITGO	Heater 118 B-51
Ameren Edwards	Boiler #2	CITGO	Heater 122 B-2
Ameren Edwards	Boiler #3	CITGO	Heater 123 B-5
Ameren Duck Creek	Boiler #1	CITGO	Heater 125 B-1
Midwest Gen. Powerton	Boiler #51	CITGO	Reboiler 125 B-2
Midwest Gen. Powerton	Boiler #52	CITGO	SRU 119 A train
Midwest Gen. Powerton	Boiler #61	CITGO	SRU 119 B train
Midwest Gen. Powerton	Boiler #62	CITGO	SRU 121 C train
Midwest Gen. Joliet	Boiler #71	CITGO	SRU 121 D train
Midwest Gen. Joliet	Boiler #72	ExxonMobil	South sulfur trains
Midwest Gen. Joliet	Boiler #81	ExxonMobil	FCCU
Midwest Gen. Joliet	Boiler #82	ExxonMobil	Heaters 1B1A & 1B1B
Midwest Gen. Will County	Boiler #4	ExxonMobil	Vacuum heater
CWLP	Boiler Dallman 1	ExxonMobil	Coker chg heaters (E & W)
CWLP	Boiler Dallman 2	ExxonMobil	Heater 7B1
CWLP	Boiler Lakeside 8	ExxonMobil	Aux boiler
CITGO	Heater 111B-1A	ExxonMobil	Sat gas lean oil reboiler
CITGO	Heater 111B-1B	ExxonMobil	Heater 2B3
CITGO	Heater 111B-2	ExxonMobil	Heater 2B5
CITGO	FCCU	ExxonMobil	Heater 2B4
CITGO	Heater 113 B-1	ExxonMobil	Heater 2B6
CITGO	Aux Boiler 430 B-1	ExxonMobil	Heater 2B7
CITGO	Heater 113 B-2	ExxonMobil	Reboiler 17-B-2
CITGO	Heater 114 B-1	ExxonMobil	Heater 3B1
CITGO	Heater 114 B-2	ExxonMobil	Heater 3B2
CITGO	Heater 114 B-3	ExxonMobil	Blow down East flare
CITGO	Heater 115 B-1	ExxonMobil	Blow down South flare

4.0 BART Controls in Illinois

The Regional Haze Rule defines BART as: "... an emission limitation based on the degree of reduction achievable through application of the best system of continuous emission reduction for each pollutant which is emitted by a [BART-eligible source]." 40 CFR §51.301. Once it is determined that a source is subject to BART, the following five factors must be considered to establish an emission limitation to meet the BART requirement:

1. the cost of compliance;
2. the energy and non air quality environmental impacts of compliance;
3. any pollution control equipment in use or in existence at the source;
4. the remaining useful life of the source;
5. the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology.

Illinois EPA has considered these factors to determine the level of control necessary for those units and sources to meet BART.

4.1 BART Controls for Illinois EGUs

For coal-fired EGUs, the BART Guidelines provide presumptive emission limits or control levels for various boiler types and coal types. The presumptive emission limits for coal-fired EGUs are shown in Table 4.1.

The Illinois EPA has compared these presumptive BART emission levels to existing emission reduction requirements and commitments for the subject-to-BART EGUs in Illinois. The existing emission reduction requirements and commitments for coal-fired EGUs in Illinois that are subject-to-BART include:

- the Multi-Pollutant Standards ("MPS") and Combined Pollutant Standard ("CPS") codified in the Illinois Mercury Rule, 35 Ill. Adm. Code Part 225, that apply to Ameren, Dynegy, and Midwest Generation;

- a multi-pollutant agreement between the Illinois EPA and Dominion Energy Services, as operator, and Kincaid Generation, LLC, as owner, of the Kincaid Generating Station (collectively "Dominion Kincaid"), to achieve BART-control levels; and
- a similar agreement between the Illinois EPA and the City of Springfield, Illinois d/b/a City, Water, Light and Power (CWLP), to achieve BART-control levels and to shut down one of its existing subject-to-BART units.

Table 4.1 Presumptive BART Emission Limits for Coal-Fired EGUs

Pollutant	Boiler Type	Coal Type	Presumptive Limit (lbs/mmBTU)
SO_2	All units	All coal types	0.15 (or 95% control)
NOx	Dry-bottom wall-fired	Bituminous	0.39
		Sub-bituminous	0.23
		Lignite	0.29
	Tangential-fired	Bituminous	0.28
		Sub-bituminous	0.15
		Lignite	0.17
	Cell burners	Bituminous	0.40
		Sub-bituminous	0.45
	Dry-turbo-fired	Bituminous	0.32
		Sub-bituminous	0.23
	Wet-bottom tangential-fired	All	0.62
	Cyclone	All	0.10

4.1.1 EGUs under the MPS and CPS

Three electric utilities operating in Illinois, Dynegy, Ameren, and Midwest Generation have committed to comply with the MPS and CPS under the Illinois Mercury Rule, requiring the installation of state-of-the-art pollution controls on many of their electric generating units in

Illinois. These regulations were promulgated to allow coal-fired electric utilities more flexibility in meeting the Illinois Mercury Rule in exchange for significant NO_x and SO_2 reductions. Appendix C contains the relevant portions of the fully adopted Illinois Mercury Rule, with the requirements for NOx and SO_2 emission reductions highlighted. Illinois intends to submit Appendix C to USEPA, the highlighted portions of which will become part of Illinois' SIP to satisfy BART obligations for affected units at these three utilities. In addition, the MPS and CPS requirements will ultimately be contained in federally enforceable permits.

The MPS and CPS require affected utilities to meet fleet-wide average emission rates, which will require installation of controls on emission units regardless of whether or not they are subject to BART. The agreements between Illinois and the utilities are intended to allow the companies the flexibility to meet the fleet-wide emission limits in the most cost-effective manner. The agreements contain a range of compliance dates, beginning as early as 2012 and as late as 2019. The Illinois EPA recognizes that, in general, the compliance date for BART controls is within 5 years of USEPA's approval of the State's SIP. Assuming USEPA approves Illinois' SIP in 2011 or 2012, the compliance date for BART controls would be in 2016 or 2017. The Illinois EPA's analysis of emission reductions that will result from implementation of the MPS and CPS by the year 2015 demonstrates conclusively that Illinois' approach will yield much larger reductions of NO_x and SO_2 than will implementation of BART controls on just subject to BART emission units. Emission reductions occurring after 2015 will improve visibility in Class I areas impacted by sources in Illinois, regardless of USEPA's decision of whether to approve those reductions as meeting BART requirements. The following subsections provide Illinois EPA's analysis of the emission reductions expected from the MPS and CPS and a description of the controls that will most likely be installed as a result of the MPS and CPS.

4.1.1.1 Dynegy

Dynegy operates several electric generating stations in Illinois, all of which are affected by the requirements of the MPS. Only the three coal-fired boilers at Baldwin are subject to BART, however. Units 1 and 2 at Baldwin are cyclone-fired boilers burning sub-bituminous coal, while Unit 3 is a tangentially-fired unit burning sub-bituminous coal. Currently, Units 1 and 2 are controlled by over-fire air ("OFA") and selective catalytic reduction ("SCR") for NO_x, while

Unit 3 is controlled by low-NO_x burners and OFA. All three units are also limited by a federal consent decree which requires that by December 31, 2012 NOx emissions cannot exceed 0.10 pounds per million British thermal units ("lb/mmBTU") of NO_x on a 30-day rolling average. The presumptive BART emission limit for NOx for cyclone-fired boilers is 0.10 lb/mmBTU. For tangentially-fired EGU boilers burning sub-bituminous coal, the presumptive BART emission limit for NO_x is 0.15 lb/mmBTU. Since all three units at Baldwin are required to meet 0.10 lb/mmBTU, the presumptive BART limits for NO_x will be met.

All three units at Baldwin currently use low-sulfur coal to reduce SO_2 emissions. However, Dynegy is installing dry scrubbers on all three units at Baldwin by December 31, 2012, which will allow these units to achieve SO_2 emissions levels well below the presumptive BART limit of 0.15 lb/mmBTU. Dynegy has also committed to installing baghouses for particulate control on all three units by December 31, 2012.

Tables 4.2 and 4.3 compare the emission reductions expected from Dynegy system wide from compliance with the MPS and the expected emission reductions from compliance with BART for NO_x and SO_2, respectively. USEPA requires that BART controls be installed within five years from the date the State's BART SIP is approved. Accordingly, Tables 4.2 and 4.3 compare expected emissions reductions from the MPS with the reductions that would be achieved from the subject to BART units meeting the presumptive BART emission limits for the year 2015. The Illinois EPA has estimated that compliance with the MPS will reduce NO_x emissions from Dynegy system wide by 23,831 TPY compared to 2002 emissions levels, and will reduce SO_2 emissions system wide by 47,347 TPY compared to 2002 emissions levels. Applying presumptive BART controls to just the units at Baldwin that are subject to BART will yield NOx reductions of 16,169 TPY, and SO_2 reductions of 16,658 TPY. Compliance with the MPS on a system-wide basis will therefore yield much larger reductions of NO_x and SO_2 than will the application of BART.

Table 4.2 NO_x reductions from Dynegy EGUs BART vs. MPS

		Base Year			Presumptive BART		MPS 2015*		MPS Final*	
Plant	Unit	1000 mmBTU	Lbs/ mmBTU	Tons	Lbs/ mmBTU	Tons/Year Reduction	Lbs/ mmBTU	Tons/Year Reduction	Lbs/ mmBTU	Tons/Year Reduction
Baldwin	1	43,884	0.55	12,119	0.10	9,925	0.10	9,925	0.10	9,925
Baldwin	2	37,135	0.4	7,405	0.10	5,548	0.10	5,548	0.10	5,548
Baldwin	3	46,403	0.12	2,850	0.15	-696	0.10	464	0.10	464
Havana	9	28,514	0.27	3,901	NA	NA	0.10	2,424	0.10	2,424
Hennepin	1	4,684	0.32	760	NA	NA	0.10	515	0.10	515
Hennepin	2	17,575	0.33	2,862	NA	NA	0.10	2,021	0.10	2,021
Vermilion	1	5,311	0.37	986	NA	NA	0.10	717	0.10	717
Vermilion	2	6,741	0.37	1,231	NA	NA	0.10	910	0.10	910
Wood River	4	5,561	0.19	521	NA	NA	0.10	250	0.10	250
Wood River	5	17,611	0.22	1,903	NA	NA	0.10	1,057	0.10	1,057
			0.324			16,169		23,831		23,831

*The MPS emission limits are a system-wide average and are not intended to reflect unit-specific emission limits.

Table 4.3 SO_2 reductions from Dynegy EGUs BART vs. MPS

		Base Year			Presumptive BART		MPS 2015*		MPS Final*	
Plant	Unit	1000 mmBTU	Lbs/ mmBTU	Tons	Lbs/ mmBTU	Tons/Year Reduction	Lbs/ mmBTU	Tons/Year Reduction	Lbs/ mmBTU	Tons/Year Reduction
Baldwin	1	43,884	0.41	9,053	0.15	5,705	0.19	4,827	0.19	4,827
Baldwin	2	37,135	0.39	7,283	0.15	4,456	0.19	3,714	0.19	3,714
Baldwin	3	46,403	0.43	9,931	0.15	6,496	0.19	5,568	0.19	5,568
Havana	9	28,514	0.9	12,815	NA	NA	0.19	10,122	0.19	10,122
Hennepin	1	4,684	0.43	1,000	NA	NA	0.19	562	0.19	562
Hennepin	2	17,575	0.43	3,792	NA	NA	0.19	2,109	0.19	2,109
Vermilion	1	5,311	2.75	7,293	NA	NA	0.19	6,798	0.19	6,798
Vermilion	2	6,741	2.74	9,224	NA	NA	0.19	8,595	0.19	8,595
Wood River	4	5,561	0.55	1,536	NA	NA	0.19	1,001	0.19	1,001
Wood River	5	17,611	0.65	5,726	NA	NA	0.19	4,051	0.19	4,051
			0.634			16,658		47,347		47,347

*The MPS emission limits are a system-wide average and are not intended to reflect unit-specific emission limits.

Appendix C

Illinois Mercury Rule

The Illinois EPA is seeking approval from the United States Environmental Protection Agency of the following ***bolded*** *provisions of the Illinois Mercury Rule, 35 Ill. Adm. Code Part 225, Subpart B: Control of Mercury Emissions from Coal-Fired Electric Generating Units, under this submission. Please note that the non-bolded provisions are included for context.*

Section 225.233 Multi-Pollutant Standards (MPS)

a) General.

1) As an alternative to compliance with the emissions standards of Section 225.230(a), the owner of eligible EGUs may elect for those EGUs to demonstrate compliance pursuant to this Section, which establishes control requirements and standards for emissions of NO_x and SO_2, as well as for emissions of mercury.

2) For the purpose of this Section, the following requirements apply:

A) An eligible EGU is an EGU that is located in Illinois and which commenced commercial operation on or before December 31, 2004; and

B) Ownership of an eligible EGU is determined based on direct ownership, by the holding of a majority interest in a company that owns the EGU or EGUs, or by the common ownership of the company that owns the EGU, whether through a parent-subsidiary relationship, as a sister corporation, or as an affiliated corporation with the same parent corporation, provided that the owner has the right or authority to submit a CAAPP application on behalf of the EGU.

3) The owner of one or more EGUs electing to demonstrate compliance with this Subpart B pursuant to this Section must submit an application for a CAAPP permit modification to the Agency, as provided in Section 225.220, that includes the information specified in subsection (b) of this Section and which clearly states the owner's election to demonstrate compliance pursuant to this Section 225.233.

A) If the owner of one or more EGUs elects to demonstrate compliance with this Subpart pursuant to this Section, then all EGUs it owns in Illinois as of July 1, 2006, as defined in subsection (a)(2)(B) of this Section, must be thereafter subject to the standards and control

requirements of this Section, except as provided in subsection (a)(3)(B). Such EGUs must be referred to as a Multi-Pollutant Standard (MPS) Group.

B) Notwithstanding the foregoing, the owner may exclude from an MPS Group any EGU scheduled for permanent shutdown that the owner so designates in its CAAPP application required to be submitted pursuant to subsection (a)(3) of this Section, with compliance for such units to be achieved by means of Section 225.235.

4) When an EGU is subject to the requirements of this Section, the requirements apply to all owners or operators of the EGU.

b) Notice of Intent.

The owner of one or more EGUs that intends to comply with this Subpart B by means of this Section must notify the Agency of its intention by December 31, 2007. The following information must accompany the notification:

1) The identification of each EGU that will be complying with this Subpart B by means of the multi-pollutant standards contained in this Section, with evidence that the owner has identified all EGUs that it owned in Illinois as of July 1, 2006 and which commenced commercial operation on or before December 31, 2004;

2) If an EGU identified in subsection (b)(1) of this Section is also owned or operated by a person different than the owner submitting the notice of intent, a demonstration that the submitter has the right to commit the EGU or authorization from the responsible official for the EGU accepting the application;

3) The Base Emission Rates for the EGUs, with copies of supporting data and calculations;

4) A summary of the current control devices installed and operating on each EGU and identification of the additional control devices that will likely be needed for the each EGU to comply with emission control requirements of this Section, including identification of each EGU in the MPS group that will be addressed by subsection (c)(1)(B) of this Section, with information showing that the eligibility criteria for this subsection (b) are satisfied; and

5) Identification of each EGU that is scheduled for permanent shut down, as provided by Section 225.235, which will not be part of the MPS Group and which will not be demonstrating compliance with this Subpart B pursuant to this Section.

c) Control Technology Requirements for Emissions of Mercury.

1) Requirements for EGUs in an MPS Group.

A) For each EGU in an MPS Group other than an EGU that is addressed by subsection (c)(1)(B) of this Section for the period beginning July 1, 2009 (or December 31, 2009 for an EGU for which an SO_2 scrubber or fabric filter is being installed to be in operation by December 31, 2009), and ending on December 31, 2014 (or such earlier date that the EGU is subject to the mercury emission standard in subsection (d)(1) of this Section), the owner or operator of the EGU must install, to the extent not already installed, and properly operate and maintain one of the following emission control devices:

i) A Halogenated Activated Carbon Injection System, complying with the sorbent injection requirements of subsection (c)(2) of this Section, except as may be otherwise provided by subsection (c)(4) of this Section, and followed by a Cold-Side Electrostatic Precipitator or Fabric Filter; or

ii) If the boiler fires bituminous coal, a Selective Catalytic Reduction (SCR) System and an SO_2 Scrubber.

B) An owner of an EGU in an MPS Group has two options under this subsection (c). For an MPS Group that contains EGUs smaller than 90 gross MW in capacity, the owner may designate any such EGUs to be not subject to subsection (c)(1)(A) of this Section. Or, for an MPS Group that contains EGUs with gross MW capacity of less than 115 MW, the owner may designate any such EGUs to be not subject to subsection (c)(1)(A) of this Section, provided that the aggregate gross MW capacity of the designated EGUs does not exceed 4% of the total gross MW capacity of the MPS Group. For any EGU subject to one of these two options, unless the EGU is subject to the emission standards in subsection (d)(2) of this Section, beginning on January 1, 2013, and continuing until such date that the owner or operator of the EGU commits to comply with the mercury emission standard in subsection (d)(2) of this Section, the owner or operator of the EGU must install and properly operate and maintain a Halogenated Activated Carbon Injection System that complies with the sorbent injection requirements of subsection (c)(2) of this Section, except as may be otherwise provided by subsection (c)(4) of this Section, and followed by either a Cold-Side Electrostatic Precipitator or Fabric Filter. The use of a properly installed, operated, and maintained Halogenated Activated Carbon Injection System that meets the sorbent injection requirements of subsection (c)(2) of this Section is defined as the "principal control technique."

2) For each EGU for which injection of halogenated activated carbon is required by subsection (c)(1) of this Section, the owner or operator of the EGU must inject halogenated activated carbon in an optimum manner, which, except as provided in subsection (c)(4) of this Section, is defined as all of the following:

A) The use of an injection system designed for effective absorption of mercury, considering the configuration of the EGU and its ductwork;

B) The injection of halogenated activated carbon manufactured by Alstom, Norit, or Sorbent Technologies, Calgon Carbon's FLUEPAC CF Plus, or Calgon Carbon's FLUEPAC MC Plus, or the injection of any other halogenated activated carbon or sorbent that the owner or operator of the EGU has demonstrated to have similar or better effectiveness for control of mercury emissions; and

C) The injection of sorbent at the following minimum rates, as applicable:

i) For an EGU firing subbituminous coal, 5.0 lbs per million actual cubic feet or, for any cyclone-fired EGU that will install a scrubber and baghouse by December 31, 2012, and which already meets an emission rate of 0.020 lbs mercury/GWh gross electrical output or at least 75 percent reduction of input mercury, 2.5 lbs per million actual cubic feet;

ii) For an EGU firing bituminous coal, 10.0 lbs per million actual cubic feet for any cyclone-fired EGU that will install a scrubber and baghouse by December 31, 2012, and which already meets an emission rate of 0.020 lb mercury/GWh gross electrical output or at least 75 percent reduction of input mercury, 5.0 lbs per million actual cubic feet;

iii) For an EGU firing a blend of subbituminous and bituminous coal, a rate that is the weighted average of the above rates, based on the blend of coal being fired; or

iv) A rate or rates set lower by the Agency, in writing, than the rate specified in any of subsections (c)(2)(C)(i), (c)(2)(C)(ii), or (c)(2)(C)(iii) of this Section on a unit-specific basis, provided that the owner or operator of the EGU has demonstrated that such rate or rates are needed so that carbon injection will not increase particulate matter emissions or opacity so as to threaten noncompliance with applicable requirements for particulate matter or opacity.

D) For the purposes of subsection (c)(2)(C) of this Section, the flue gas flow shall be the gas flow rate in the stack for all units except for those equipped with activated carbon injection prior to a hot-side electrostatic precipitator; for units equipped with activated carbon injection prior to a hot-side electrostatic precipitator, the flue gas flow rate shall be the gas flow rate at the inlet to the hot-side electrostatic precipitator, which shall be determined as the stack flow rate adjusted through the use of Charles' Law for the differences in gas temperatures in the stack and at the inlet to the electrostatic precipitator ($V_{esp} = V_{stack} \times T_{esp}/T_{stack}$, where V = gas flow rate in acf and T = gas temperature in Kelvin or Rankine

3) The owner or operator of an EGU that seeks to operate an EGU with an activated carbon injection rate or rates that are set on a unit-specific basis pursuant to subsection (c)(2)(C)(iv) of this Section must submit an application to the Agency proposing such rate or rates, and must meet the requirements of subsections (c)(3)(A) and (c)(3)(B) of this Section, subject to the limitations of subsections (c)(3)(C) and (c)(3)(D) of this Section:

A) The application must be submitted as an application for a new or revised federally enforceable operating permit for the EGU, and it must include a summary of relevant mercury emission data for the EGU, the unit-specific injection rate or rates that are proposed, and detailed information to support the proposed injection rate or rates; and

B) This application must be submitted no later than the date that activated carbon must first be injected. For example, the owner or operator of an EGU that must inject activated carbon pursuant to subsection (c)(1)(A) of this subsection must apply for unit-specific injection rate or rates by July 1, 2009. Thereafter, the owner or operator of the EGU may supplement its application; and

C) Any decision of the Agency denying a permit or granting a permit with conditi that set a lower injection rate or rates may be appealed to the Board pursuant tc Section 39 of the Act; and

D) The owner or operator of an EGU may operate at the injection rate or rates proposed in its application until a final decision is made on the application, including a final decision on any appeal to the Board.

4) During any evaluation of the effectiveness of a listed sorbent, an alternative sorbent, or other technique to control mercury emissions, the owner or operator of an EGU need not comply with the requirements of subsection (c)(2) of this Section for any system needed to carry out the evaluation, as further provided as follows:

A) The owner or operator of the EGU must conduct the evaluation in accordance with a formal evaluation program submitted to the Agency at least 30 days prior to commencement of the evaluation;

B) The duration and scope of the evaluation may not exceed the duration and scope reasonably needed to complete the desired evaluation of the alternative control technique, as initially addressed by the owner or operator in a support document submitted with the evaluation program;

C) The owner or operator of the EGU must submit a report to the Agency no later than 30 days after the conclusion of the evaluation that describes the evaluation conducted and which provides the results of the evaluation; and

D) If the evaluation of the alternative control technique shows less effective control of mercury emissions from the EGU than was achieved with the principal control technique, the owner or operator of the EGU must resume use of the principal control technique. If the evaluation of the alternative control technique shows comparable effectiveness to the principal control technique, the owner or operator of the EGU may either continue to use the alternative control technique in a manner that is at least as effective as the principal control technique, or it may resume use of the principal control technique. If the evaluation of the alternative control technique shows more effective control of mercury emissions than the control technique, the owner or operator of the EGU must continue to use the alternative control technique in a manner that is more effective than the principal control technique, so long as it continues to be subject to this subsection (c).

5) In addition to complying with the applicable recordkeeping and monitoring requirements in Sections 225.240 through 225.290, the owner or operator of an EGU that elects to comply with this Subpart B by means of this Section must also comply with the following additional requirements:

A) For the first 36 months that injection of sorbent is required, it must maintain records of the usage of sorbent, the fluegas flow rate from the EGU (and, if the unit is equipped with activated carbon injection prior to a hot-side electrostatic precipitator, flue gas temperature at the inlet of the hot-side electrostatic precipitator and in the stack), and the sorbent feed rate, in pounds per million actual cubic feet of flue, on a weekly average;

B) After the first 36 months that injection of sorbent is required, it must monitor activated sorbent feed rate to the EGU, gas flow rate in the stack, and, if the unit is equipped with activated carbon injection prior to a hot-side electrostatic precipitator, flue gas temperature at the inlet of the hot-side electrostatic precipitator and in the stack. It must automatically record this data and the sorbent carbon feed rate, in pounds per million actual cubic feet of flue gas, on an hourly average; and

C) If a blend of bituminous and subbituminous coal is fired in the EGU, it must keep records of the amount of each type of coal burned and the required injection rate for injection of activated carbon, on a weekly basis.

6) Until June 30, 2012, as an alternative to the CEMS or excepted monitoring system (sorbent trap system) monitoring, recordkeeping, and reporting requirements in Sections 225.240 through 225.290, the owner or operator of an EGU may elect to comply with the emissions testing, monitoring, recordkeeping, and reporting requirements in Section 225.239(c), (d), (e), (f)(1) and (2), (h)(2), (i)(3) and (4), and (j)(1).

7) In addition to complying with the applicable reporting requirements in Sections 225.240 through 225.290, the owner or operator of an EGU that elects to comply with this Subpart B by means of this Section must also submit quarterly reports for the recordkeeping and monitoring conducted pursuant to subsection (c)(5) of this Section.

d) Emission Standards for Mercury.

1) For each EGU in an MPS Group that is not addressed by subsection (c)(1)(B) of this Section, beginning January 1, 2015 (or such earlier date when the owner or operator of the EGU notifies the Agency that it will comply with these standards) and continuing thereafter, the owner or operator of the EGU must comply with one of the following standards on a rolling 12-month basis:

A) An emission standard of 0.0080 lb mercury/GWh gross electrical output; or

B) A minimum 90-percent reduction of input mercury.

2) For each EGU in an MPS Group that has been addressed under subsection (c)(1)(B) of this Section, beginning on the date when the owner or operator of the EGU notifies the Agency that it will comply with these standards and continuing thereafter, the owner or operator of the EGU must comply with one of the following standards on a rolling 12-month basis:

A) An emission standard of 0.0080 lb mercury/GWh gross electrical output; or

B) A minimum 90-percent reduction of input mercury.

3) Compliance with the mercury emission standard or reduction requirement of this subsection (d) must be calculated in accordance with Section 225.230(a) or (d), or Section 225.232 until December 31, 2013.

4) Until June 30, 2012, as an alternative to demonstrating compliance with the emissions standards in this subsection (d), the owner or operator of an EGU may elect to comply with the emissions testing requirements in Section 225.239(a)(4), (b), (c), (d), (e), (f), (g), (h), (i), and (j) of this Subpart.

e) Emission Standards for NO_x and SO_2.

1) NO_x Emission Standards.

A) Beginning in calendar year 2012 and continuing in each calendar thereafter, for the EGUs in each MPS Group, the owner and operator of the EGUs must comply with an overall NOx annual emission rate of no more than 0.11 lb/million Btu or an emission rate equivalent to 52 percent of the Base Annual Rate of NO_x emissions, whichever is more stringent.

B) Beginning in the 2012 ozone season and continuing in each ozone season thereafter, for the EGUs in each MPS Group, the owner and operator of the EGUs must comply with an overall NO_x seasonal emission rate of no more than 0.11 lb/million Btu or an emission rate equivalent to 80 percent of the Base Seasonal Rate of NO_x emissions, whichever is more stringent.

2) SO_2 Emission Standards.

A) Beginning in calendar year 2013 and continuing in calendar year 2014, for the EGUs in each MPS Group, the owner and operator of the EGUs must comply with an overall SO_2 annual emission rate of 0.33 lb/million Btu or a rate equivalent to 44 percent of the Base Rate of SO_2 emissions, whichever is more stringent.

B) Beginning in calendar year 2015 and continuing in each calendar year thereafter, for the EGUs in each MPS Grouping, the owner and operator of the EGUs must comply with an overall annual emission rate for SO_2 of 0.25 lbs/million Btu or a rate equivalent to 35 percent of the Base Rate of SO_2 emissions, whichever is more stringent.

3) Ameren MPS Group Multi-Pollutant Standard

A) Notwithstanding the provisions of subsections (e)(1) and (2) of this Section, this subsection (e)(3) applies to the Ameren MPS Group as described in the notice of intent submitted by Ameren Energy Resources in accordance with subsection (b) of this Section.

B) NO_x Emission Standards.

i) Beginning in the 2010 ozone season and continuing in each ozone season thereafter, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall NO_x seasonal emission rate of no more than 0.11 lb/million Btu.

ii) Beginning in calendar year 2010 and continuing in calendar year 2011, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall NO_x annual emission rate of no more than 0.14 lb/million Btu.

iii) Beginning in calendar year 2012 and continuing in each calendar year thereafter, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall NO_x annual emission rate of no more than 0.11 lb/million Btu.

C) SO_2 Emission Standards

i) Beginning in calendar year 2010 and continuing in each calendar year through 2013, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall SO_2 annual emission rate of 0.50 lb/million Btu.

ii) In calendar year 2014, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall SO_2 annual emission rate of 0.43 lb/million Btu.

iii) Beginning in calendar year 2015 and continuing in calendar year 2016, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall SO_2 annual emission rate of 0.25 lb/million Btu.

iv) Beginning in calendar year 2017 and continuing in each calendar year thereafter, for the EGUs in the Ameren MPS Group, the owner and operator of the EGUs must comply with an overall SO_2 annual emission rate of 0.23 lb /million Btu.

4) Compliance with the NO_x and SO_2 emission standards must be demonstrated in accordance with Sections 225.310, 225.410, and 225.510. The owner or operator of EGUs must complete the demonstration of compliance before March 1 of the following year for annual standards and before November 1 for seasonal standards, by which date a compliance report must be submitted to the Agency.

f) Requirements for NO_x and SO_2 Allowances.

1) The owner or operator of EGUs in an MPS Group must not sell or trade to any person or otherwise exchange with or give to any person NO_x allowances allocated to the EGUs in the MPS Group for vintage years 2012 and beyond that would otherwise be available for sale, trade, or exchange as a result of actions taken to comply with the standards in subsection (e) of this Section. Such allowances that are not retired for compliance must be surrendered to the Agency on an annual basis, beginning in calendar year 2013. This provision does not apply to the use, sale, exchange, gift, or trade of allowances among the EGUs in an MPS Group.

2) The owners or operators of EGUs in an MPS Group must not sell or trade to any person or otherwise exchange with or give to any person SO_2 allowances allocated to the EGUs in the MPS Group for vintage years 2013 and beyond that would otherwise be available for sale or trade as a result of actions taken to comply with the standards in subsection (e) of this Section. Such allowances that are not retired for compliance, or otherwise surrendered pursuant to a consent decree to which the State of Illinois is a party, must be surrendered to the Agency on an annual basis, beginning in calendar year 2014. This provision does not apply to the use, sale, exchange, gift, or trade of allowances among the EGUs in an MPS Group.

3) The provisions of this subsection (f) do not restrict or inhibit the sale or trading of allowances that become available from one or more EGUs in a MPS Group as a result of holding allowances that represent over-compliance with the NO_x or SO_2 standard in subsection (e) of this Section, once such a standard becomes effective, whether such over-compliance results from control equipment, fuel changes, changes in the method of operation, unit shut downs, or other reasons.

4) For purposes of this subsection (f), NO_x and SO_2 allowances mean allowances necessary for compliance with Sections 225.310, 225.410, or 225.510, 40 CFR 72, or Subparts AA and AAAA of 40 CFR 96, or any future federal NO_x or SO_2 emissions trading programs that modify or replace these programs. This Section does not prohibit the owner or operator of EGUs in an MPS Group from purchasing or otherwise obtaining allowances from other sources as allowed by law for purposes of complying with federal or state requirements, except as specifically set forth in this Section.

5) By March 1, 2010, and continuing each year thereafter, the owner or operator of EGUs in an MPS Group must submit a report to the Agency that demonstrates compliance with the requirements of this subsection (f) for the previous calendar year, and which includes identification of any allowances that have been surrendered to the USEPA or to the Agency and any allowances that were sold, gifted, used, exchanged, or traded because they became available due to over-compliance. All allowances that are required to be surrendered must be surrendered by August 31, unless USEPA has not yet deducted the allowances

from the previous year. A final report must be submitted to the Agency by August 31 of each year, verifying that the actions described in the initial report have taken place or, if such actions have not taken place, an explanation of all changes that have occurred and the reasons for such changes. If USEPA has not deducted the allowances from the previous year by August 31, the final report will be due, and all allowances required to be surrendered must be surrendered, within 30 days after such deduction occurs.

g) **Notwithstanding 35 Ill. Adm. Code 201.146(hhh), until an EGU has complied with the applicable emission standards of subsections (d) and (e) of this Section for 12 months, the owner or operator of the EGU must obtain a construction permit for any new or modified air pollution control equipment that it proposes to construct for control of emissions of mercury, NO_x, or SO_2.**

(Source: Amended at 33 Ill. Reg. 10427, effective June 26, 2009)

Section 225.291 Combined Pollutant Standard: Purpose

The purpose of Sections 225.291 through 225.299 (hereinafter referred to as the Combined Pollutant Standard ("CPS")) is to allow an alternate means of compliance with the emissions standards for mercury in Section 225.230(a) for specified EGUs through permanent shut-down, installation of ACI, and the application of pollution control technology for NO_x, PM, and SO_2 emissions that also reduce mercury emissions as a co-benefit and to establish permanent emissions standards for those specified EGUs. Unless otherwise provided for in the CPS, owners and operators of those specified EGUs are not excused from compliance with other applicable requirements of Subparts B, C, D, and E.

(Source: Added at 33 Ill. Reg. 10427, effective June 26, 2009)

Section 225.292 Applicability of the Combined Pollutant Standard

a) **As an alternative to compliance with the emissions standards of Section 225.230(a), the owner or operator of specified EGUs in the CPS located at Fisk, Crawford, Joliet, Powerton, Waukegan, and Will County power plants may elect for all of those EGUs as a group to demonstrate compliance pursuant to the CPS, which establishes control requirements and emissions standards for NO_x, PM, SO_2, and mercury. For this purpose, ownership of a specified EGU is determined based on direct ownership, by holding a majority interest in a company that owns the EGU or EGUs, or by the common ownership of the company that owns the EGU, whether through a parent-subsidiary relationship, as a sister corporation, or as an affiliated corporation with the same parent corporation, provided that the owner or operator has the right or authority to submit a CAAPP application on behalf of the EGU.**

EXHIBIT 12

Letter from Laurel Kroack, Illinois EPA to Cheryl Newton, USEPA

SO_2 NAAQS Designation Recommendations

(June 2, 2011)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

217/ 785-4140
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PAT QUINN, GOVERNOR

June 2, 2011

Ms. Cheryl A. Newton, Director
Office of the Air and Radiation Division
U.S. Environmental Protection Agency, Region V (R18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Dear Ms. Newton:

On behalf of Governor Quinn and pursuant to the U.S. Environmental Protection Agency's revision to the National Ambient Air Quality Standards (NAAQS) for SO_2 dated June 2, 2010, I am submitting our recommendations for attainment and nonattainment designations for the State of Illinois. Included with these recommendations is supporting documentation prepared by the Illinois Environmental Protection Agency (Illinois EPA). The Illinois EPA is also providing this documentation to your staff in electronic format to facilitate your timely review.

Specifically, the following designations are recommended for Illinois:

County (Partial)	Designation	Name of Area
<u>Tazewell County</u>: • Pekin and Cincinnati Townships • Remainder of Tazewell County	 Nonattainment Unclassifiable	Tazewell County
<u>La Salle County</u>: • La Salle Township • Remainder of La Salle County	 Nonattainment Unclassifiable	La Salle County
<u>Cook County</u>: • Lemont Township • Remainder of Cook County	 Nonattainment Unclassifiable	Cook County
<u>Will County</u>: • Lockport and DuPage Townships • Remainder of Will County	 Nonattainment Unclassifiable	Will County
<u>Madison County</u>: • Chouteau and Wood River • Remainder of Madison County	 Nonattainment Unclassifiable	Madison
All Other Counties	Unclassifiable	Illinois

We are recommending that portions of the following counties be designated as nonattainment for the 2010 primary 1-hour SO_2 NAAQS: Tazewell (Pekin and Cincinnati Townships), La Salle (La Salle Township), Cook (Lemont Township), Will (Lockport and DuPage Townships) and Madison (Chouteau and Wood River Townships). As violations of the revised SO_2 standard have been measured in these areas during 2008-2010, designating them as nonattainment is appropriate. We recommend that the remainder of Illinois be designated as unclassifiable.

If there are any questions, please feel free to contact Rob Kaleel (217-524-4343), or myself.

Sincerely,

Laurel L. Kroack

Laurel L. Kroack
Chief, Bureau of Air

Attachment